14-XXX-142

Saga
Environmental &
Engineering, Inc.

August 8, 2014

Wisconsin Department of Natural Resources
Bureau of Air Management
Permits Section
P.O. Box 7921
Madison, WI 53707-7921

RE: Significant Modification
CLCM / Mid-America Steel Drum Company, Inc. / Kitzinger
Facility Air Operation Permit Number 241063570-P12

On behalf of Container Life Cycle Management (CLCM) / Mid-America Steel Drum Company, Inc. / Kitzinger, Saga Environmental and Engineering, Inc. is submitting two copies of the attached Wisconsin Department of Natural Resources (DNR) forms to the Bureau of Air Management. The forms outline the new equipment, equipment moves, equipment replacements, and equipment elimination for the facility in St. Francis, Wisconsin. This application follows the April 20, 2014 Administrative Application highlighting some temporary changes occurring at the facility.

The facility requests to split the 241063570 permitted facility into two separate identities. Currently, site identification 241063570 includes sources at the 2529 East Norwich Avenue building and sources at the 3950 South Pennsylvania Avenue building.

Norwich Avenue

The Norwich Avenue building will continue under the ownership of Mid-America Steel Drum. The remaining Norwich Avenue significant units are as follows.

- B20: Process Boiler, and S08
- P30: Reclamation Furnace, C10: Afterburner, and S10

In addition, P31: Shot Blasting and C11: Baghouse will either be removed completely, or will be vented differently where all emissions will emit indoors and not through a stack. All other Norwich emission units will be either removed, dis-assembled, and/or scrapped. As shown in the

Missouri Office:
3406 Panther Creek Road
Fordland, MO 65652
telephone: 262.995.4235

Oregon Office:
6665 SW Hampton Street
Suite #101
Tigard, OR 97223
telephone: 503.694.6960

Wisconsin Office:
110 E. Lake Street
Suite #1
Lake Mills, WI 53551
telephone: 920.945.0601

attached calculation spreadsheets A through E, the new criteria pollutants' MTE are below 5.7 pounds per year, and there are no significant potential HAP emissions. Based on these calculations, the Norwich facility emissions will fall below the NR 406 and 407 permitting exemption thresholds. With this information, the Norwich facility is requesting to be considered a True Minor source.

Move Between Buildings

The following equipment and stacks are being moved from the building at Norwich Avenue to the building at Pennsylvania Avenue.

- P50C: Closed Drum Drying Oven Natural Gas Fired, and S53
- P32C: Auto Exterior Drum Spray Booth, C32C: Overspray Filter, and S12C
- P32B: Curing Oven Natural Gas Fired, and S12B

Pennsylvania Avenue

A majority of operations are now going to occur at the Pennsylvania Avenue building. This building will be under new ownership – Container Life Cycle Management (CLCM).

A new larger caustic wet scrubber C10 with the associated stack S98 is being added to replace the current web scrubber C21 and associated stack S21. C21 and S21 are being completely disassembled and removed.

The following equipment and stacks are being added.

- P11: Bung Wash
  Vents only to C10: Caustic Wet Scrubber
- P12: Water Heater 4, and S92
  Vents to S92 *and* C10: Caustic Wet Scrubber
  Maximum Heat Input Rate: 2.00 mmBtu/hr
- P13: Oil/Water Heater 3, and S93
  Vents to S93 *and* C10: Caustic Wet Scrubber
  Maximum Heat Input Rate: 2.00 mmBtu/hr
- P16: Label Remover High Pressure Washer
  Vents only to C10: Caustic Wet Scrubber
  Install: Fall 2014
- P14: Caustic Heater 2, and S94
  Vents to S94 *and* C10: Caustic Wet Scrubber
  Maximum Heat Input Rate: 3.60 mmBtu/hr
- P15: Caustic Heater 1 and 2,000-Gallon Tank, and S95
  Vents to S95 *and* C10: Caustic Wet Scrubber
  Maximum Heat Input Rate: 2.00 mmBtu/hr

- P71: De-Labeling, and S91 (fugitive)
  Maximum Solvent *(will not use HAP-containing solvent)* Usage: 3.75 gal/hr
- P72: Exterior Wash/Soaker
  Vents only to C10: Caustic Wet Scrubber
- P73: Exterior Rinse
  Vents only to C10: Caustic Wet Scrubber
- P74: Internal Double Split Washer
  Vents only to C10: Caustic Wet Scrubber
- P75: Acidizer and C70: Acid Wet Scrubber
  P75 vents to C70 then to C10: Caustic Wet Scrubber
  Maximum 31.45% HCl Usage: 120.19 lb/hr

In addition to the above listed new and moving units, the Pennsylvania Avenue location will continue to operate, but will have updated venting configurations.

- P80A: Interior Caustic Preflush
  Vents only to C10: Caustic Wet Scrubber
- P80B: Exterior Wash/Soaker
  Vents only to C10: Caustic Wet Scrubber
- P80C: Exterior Rinse
  Vents only to C10: Caustic Wet Scrubber
- P42: Replacement Internal Drum Washer
  Vents only to C10: Caustic Wet Scrubber
- P41: Drying Oven/Flamer Natural Gas Fired, and new stack S96 (old stack S66 being removed)
  Vents to S96 *and* C10: Caustic Wet Scrubber
  Maximum Heat Input Rate: 0.60 mmBtu/hr (the heat rating is updated since April 21, 2014 application)
- P42C: Hot Water Heater Natural Gas Fired, S62
  Maximum Heat Input Rate: 1.75 mmBtu/hr
- P95: Drum Caustic Pre-Flush
  Vents only to C10: Caustic Wet Scrubber
- P45: Drum Wipe Cleaning, and S45 (fugitive)
  Maximum Solvent *(will not use HAP-containing solvent)* Usage: 3.75 gal/hr
- P44: Label Stripping, and S44 (fugitive)
  Maximum Solvent Usage: 3.00 gal/hr (limit of 2,250 gal/yr)

The new caustic scrubber C10 will not only receive the processes and control listed above, it will have the following non-identified processes vented to it: Settling Tank 1, Settling Tank 2, Oil Water Separator, Used Oil Tank, Oil Treatment Tank, Poly Auto Purge 1, Poly Auto Purge 2, and Water Treatment System.

The emission units and stack that are no longer going to be at the Pennsylvania Avenue location are as follows.

- P90C: Hot Water Heater 2.5 mmBTU/hr, and S69
- P90A: Hot Caustic Heater 2.5 mmBTU/hr, and S67
- P90B: Hot Caustic Heater 2.5 mmBTU/hr, and S68
- S66 (being replaced by S96 that is associated with P41)
- P42A: Hot Water Heater 1.75 mmBTU/hr, and S64 (as outlined in April 21, 2014 application)
- P42B: Hot Water Heater 1.75 mmBTU/hr, and S63 (as outlined in April 21, 2014 application)
- "Hot Caustic Heater 1.75 mmBTU/hr" portion of P80A, and S60 are being removed – the interior caustic preflushing operations of P80A will still occur (as outlined in April 21, 2014 application)
- "Hot Caustic Heater 2.75 mmBTU/hr" portion of P80B, and S61 are being removed – the exterior wash/soaker operations of P80B will still occur

Once the modifications are complete, the facility's raw material usages will change. Based on the change and the calculations included in the application, the Pennsylvania Avenue facility requests to change air permit status category to a Synthetic Minor source.

If you have any questions based on the attached application forms, figures, and attachments, please contact Mark Furgason at (414) 483-8801 or me at (920) 945-0601.

Sincerely,
Saga Environmental and Engineering, Inc.

Amy J. Litscher
President/Principal Environmental Scientist

Enclosures

cc: Mr. Mark Furgason, Mid-America Steel Drum Company, Inc. (via EMAIL)
Mr. Scott Swosinski, Mid-America Steel Drum Company, Inc. (via EMAIL)

TABLE A. Total Emissions
MASD St. Francis, Norwich Ave. - Updated July 2014

POLLUTANT	TOTAL			
	PTE		MTE	
	lb/hr	ton/yr	lb/hr	ton/yr
VOC - Total	0.12	0.51	0.12	0.51
Carbon Monoxide (CO)	1.78	7.80	1.78	7.80
Nitrogen Oxides (NO_X)	2.12	9.29	2.12	9.29
Particulates (PM)	5.11	4.67	5.11	22.39
Particulates-10 (PM-10)	0.16	0.71	0.16	0.71
Sulfur Dioxide (SO_2)	0.01	0.06	0.01	0.06
Lead (Pb)	0.00001	0.00005	0.00001	0.00005
Triethylamine (HAP)				
Sodium Hydroxide (mist)				

TABLE B. Boiler Emissions - B20
MASD St. Francis, Norwich Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0052	45.55	0.437	1.913
NOx	100.0	0.0052	45.55	0.520	2.278
PM	7.6	0.0052	45.55	0.040	0.173
PM-10	7.6	0.0052	45.55	0.040	0.173
SO_2	0.6	0.0052	45.55	0.003	0.014
VOC	5.5	0.0052	45.55	0.029	0.125
Lead	0.0005	0.0052	45.55	0.000003	0.000011

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 5.2 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE C. Reclamation Furnace Emissions - P30
MASD St. Francis, Norwich Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0160	140.16	1.344	5.887
NOx	100.0	0.0160	140.16	1.600	7.008
PM	7.6	0.0160	140.16	0.122	0.533
PM-10	7.6	0.0160	140.16	0.122	0.533
SO_2	0.6	0.0160	140.16	0.010	0.042
VOC	5.5	0.0160	140.16	0.088	0.385
Lead	0.0005	0.0160	140.16	0.000008	0.000035

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 16.0 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

	EMISSION FACTOR lb PM/drum	USAGE PTE/MTE drums/hr	PTE drums/mo	drums/yr	MTE drums/yr	CONTROL EFF. %	TOTAL PTE lb/hr	ton/yr	MTE lb/hr	ton/yr
PM	0.0165	300	40,000	480,000	2,628,000	0%	4.95	3.960	4.95	21.7

1. Potential Operating Hours: 1,600 hr/yr
3. The emission factor was taken from the facility's most recent stack test showing the PM lb/hr emissions of 5.0.
4. VOC and HAP emissions from the Reclamation Furnace are considered insignificant, and in addition are vented to an afterburner following MACT requirements.

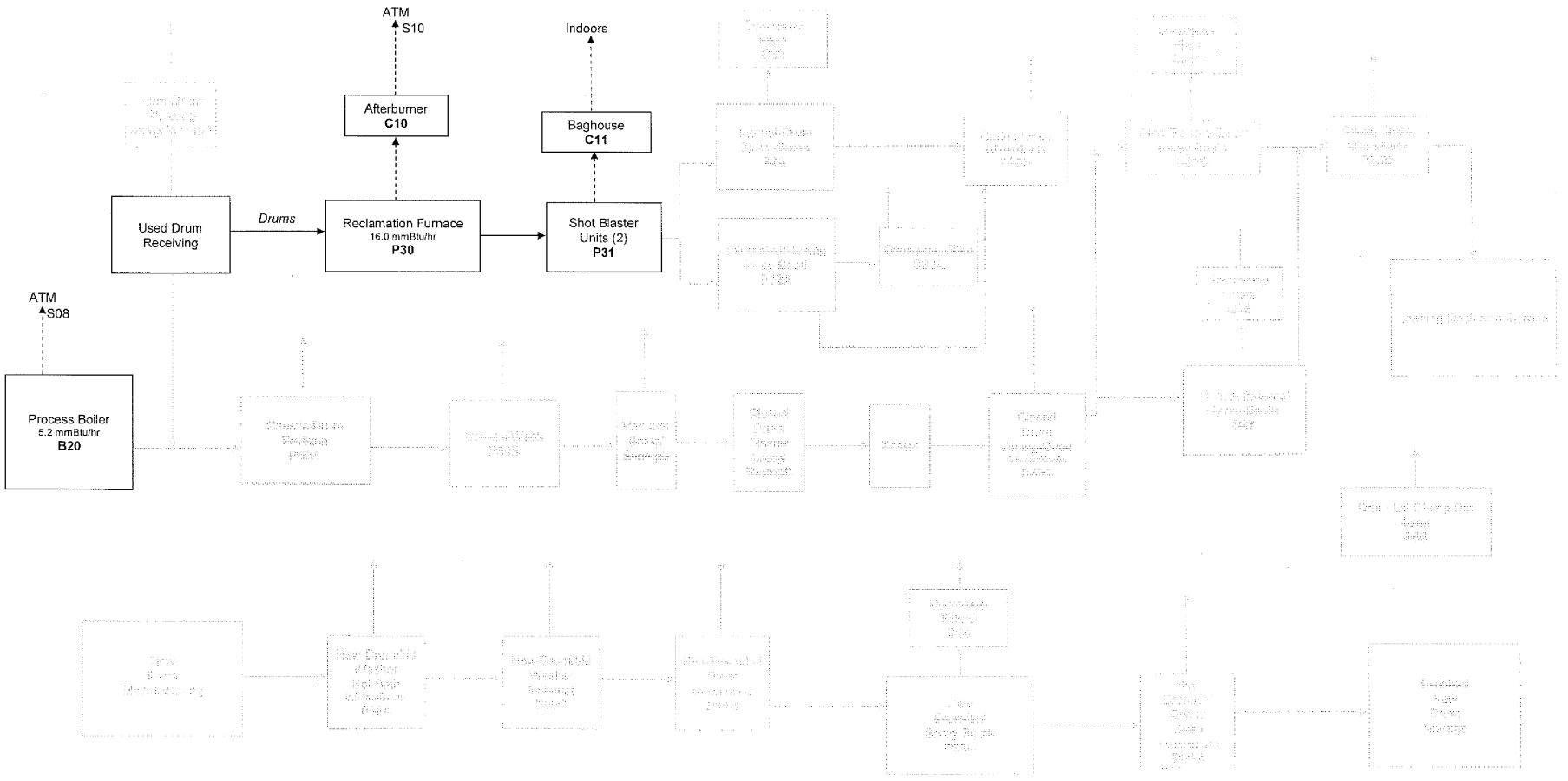
TABLE D. Shot Blasting Emissions - P31
MASD St. Francis, Norwich Ave. - Updated July 2014

	EMISSION FACTOR	USAGE PTE/MTE			CONTROL EFF.	TOTAL PTE/MTE	
	lb PM/drum	drums/hr	drums/mo	drums/yr	%	lb/hr	ton/yr
PM	0.222	300	219,000	2,628,000	100%		

1. Potential Operating Hours: 1,600 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr
3. The emission factor of 0.222 was based on P31's current permitted levels.
4. The control efficiency is assumed 100% due to venting indoors.

TABLE E. Stack Parameters
MASD St. Francis, Norwich Ave. - Updated July 2014

Stack ID	Form	Exhaust/ Process-Control Unit	Process Name	Stack/ Fugitive	Discharge Height (ft)	Inside Dimensions/Stack Diameter		Exhaust/Stack Flow Rate		Exhaust Gas Temp. (Degrees F)	Exhaust/Stack Moisture Content		Exhaust Gas Discharge Direction	Obstruction (yes/no)
						Circular (ft)	Rectangular (ft x ft)	Normal (ACFM)	Maximum (ACFM)		Normal (% by Vol.)	Maximum (% by Vol.)		
S08	4530-104	B20	Process Boiler	Stack	40	0.83		1,000	1,000	450	2	10	Up	Yes
S10	4530-113	C10	Afterburner	Stack	50		4.33 x 3.25	36,000	36,000	550	2	10	Up	No
N/A	4530-117	C11	Baghouse	Fugitive										



Saga Env. and Eng., Inc. 110 E. Lake Street #1 Lake Mills, WI 53551 (920)-674-3411	Mid-America Steel Drum - Kitzinger St. Francis, WI **Figure: Facility Process Flow Diagram** **Norwich Avenue Processes**	FILE: Process Flow Diagram DWN DATE: 07/21/14 PROJECT NO: 11-009 APPROVED: A. Litscher DRAFTER: A. Litscher

14-XXX-142

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Facility Identification
Air Pollution Control Permit Application
Form 4530-100 (R 1/11)

Notice: Use of this form is required by the Department for any air pollution control permit application filed pursuant to ss. 285.61, 285.62 or 285.66, Wis. Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this application form. You are required to submit two copies in accordance with s. NR 407.05(2), Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law [ss. 19.31-19.39, Wis. Stats.].

Facility Information

Facility Name	Standard Industrial Class Code (SIC)	Facility ID Number (FID)
Mid-America Steel Drum Company, Inc. / Kitzinger	3412	241063570

Street Address (where pollution sources are/will be located)	◉ City ○ Town ○ Village	County
2529 E. Norwich Avenue	of Saint Francis	Milwaukee

Primary Operating Activity (e.g., lead-acid battery manufacturer or sulfite paper mill)	Is the facility located in an area designated as "nonattainment"? (refer to instruction booklet)	If yes, indicate the pollutant(s) for the nonattainment designation
Reconditioning steel/plastic drums and totes	◉ Yes ○ No	Ozone

Applicant Information

Applicant Name (provide full business or individual's name)

Mid-America Steel Drum Company, Inc. / Kitzinger

RECEIVED AUG 11 2014 AIR MANAGEMENT

Mailing Address	City	State	ZIP Code
2529 E. Norwich Avenue	Saint Francis	WI	53235

Parent Corporation or Owner Name (if not wholly owned by applicant)

Container Life Cycle Management (CLCM)

Mailing Address	City	State	ZIP Code	Country (if not U.S.)
8570 South Chicago Road	Oak Creek	WI	53154	

Responsible Official Name–person legally responsible for the operation of the permitted air pollution sources [see NR 400.02(80e), Wis. Adm. Code]

Scott Swosinski

Title	Phone Number
Vice President and General Manager	(414) 762-1114

Permit Contact Person – to be contacted for additional information concerning air pollution sources

Mark Furgason

Title	Phone Number
St. Francis Site Manager	(414) 483-8800

Permit Information

Instructions: If applying for a construction permit (including modification, reconstruction, relocation, and replacement), you MUST also apply for an operation permit, an operation permit renewal, or an operation permit revision. Select 'Operation Permit' if you currently do not have a facility-wide operation permit. Select 'Operation Permit Renewal' if you are renewing your facility-wide operation permit in conjunction with the proposed project. Otherwise, select 'Operation Permit Revision' so that your facility-wide operation permit will be revised to reflect the proposed project.

Permit Type:

◉ Construction Permit

Anticipated construction start date: 08/30/2014 (mm/dd/yy) Anticipated operation start date: 10/31/2014 (mm/dd/yy)

☒ Initial application fee attached ($7,500)

○ Construction Permit Exemption and Authority – List appropriate Code citation: _____

○ Construction Permit Revision – List permit to be revised: _____

○ Operation Permit Revision – List permit to be revised: _____

- ○ Administrative Revision
- ○ Minor Revision (must be accompanied by Form 4530-137)
- ○ Significant Revision

○ Operation Permit – select type:
○ Operation Permit Renewal – select type:
- ○ Part 70 Source
- ○ Synthetic Minor, Non - Part 70 Source
- ○ Non - Part 70 Source

List permit to be renewed: _____

○ Elective Operation Permit (if requesting an operation permit that is otherwise not required)

○ Operation Permit Exemption and Authority – List appropriate Code citation: _____

Expedited review fee:

If expedited review requested and fulfilled within the following time periods, the construction permit application fee you will be billed will include a surcharge for this additional service:

- ◉ 50 days from receipt of completed application for a review not conducted under ch. NR 405 or 408 - $5,000
- ○ 60 days from receipt of completed application for a review conducted under ch. NR 405 or 408 - $7,500
- ○ 90 days from receipt of completed application for a review conducted under ch. NR 405 or 408 - $4,000

Is additional information attached? ◉ Yes ○ No

Are two copies of completed form and additional information included? ◉ Yes ○ No

State of Wisconsin
Department of Natural Resources

FACILITY PLOT PLAN
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-101 12-99

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

In order for a comprehensive air quality analysis to be accomplished, a facility plot plan MUST be included with the permit application. If the application is for an initial operation permit, submit the elements under #2 below. If the application is for a renewal, answer #1 below first.

1. Have there been changes to the facility plot plan since the previous operation permit application was submitted?
   - ☐ No. The plot plan submitted with the original application can be used for the renewal.
   - ☒ Yes. An up-to-date plot plan is attached.

2. If there have been changes to the facility plot plan since the last operation permit application submittal, RESUBMIT an up-to-date plot plan which must include the following or the permit application will be deemed incomplete:

FOR DEPARTMENT USE ONLY

COMPLETE	INCOMPLETE	NOT APPLICABLE
☐	☐	
☐	☐	
☐	☐	
☐	☐	☐
☐	☐	
☐	☐	
☐	☐	

1. A building layout (blueprint, plan view) including all buildings occupied by or located on the site of the facility.

2. The maximum height of each building (excluding stack height).

3. The location and numerical designation of each stack. Please ensure these designations correspond to the appropriate stacks listed on the other permit forms in this application.

4. The location of fenced property lines (if any).

5. Identify direction "North" on all submittals.

6. All drawings shall be to scale and shall have the scale graphically depicted.

7. An additional regional map depicting the facility location in relation to the surrounding vicinity (roads or other features) shall be included.

Are there any outdoor storage piles on the facility site? ☐ Yes ☒ No

If so, what material does the pile(s) consist of?

Are there any dirt roads or unpaved parking lots on the facility site? ☒ Yes ☐ No

State of Wisconsin
Department of Natural Resources

SOURCE AND SITE DESCRIPTIONS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102 12-99 Information attached? N (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. Briefly describe the proposed project or existing Unit(s) to be permitted. Attach supplemental forms as needed.

This application is for a number of changes at the Pennsylvania Avenue site, and removal of all equipment from the Norwich Avenue location. For the proposed changes, see form 4530-102A.

For Renewal Applications:

1. Were any new or modified emissions units installed/modified at the facility since the last operation permit issuance date?
   - ☒ No. Proceed to form 4530-102A.
   - ☐ Yes. Answer the following questions:

2. Briefly describe any new/modified emissions units installed at the facility since the last operation permit issuance date and include the following information. Attach supplemental forms as needed.

   a. List the Department issued construction and/or operation permit number as applicable (identifying which units were covered by which permit if multiple permits issued).

      i. If operation permit application forms were submitted for the new emission unit(s) covered by the construction permit mentioned above, reference the date of that application.

      ii. For Part 70 Sources Only: If no operation permit application forms were submitted for the new emissions unit(s) covered by the construction permit mentioned above, complete the appropriate forms 4530-118 through 4530-125.

   b. Include the Department issued construction permit exemption number, if one was assigned, or reference the date of the letter of the exemption.

2. Site Description

Mid-America Steel Drum St. Francis facility's primary business is reconditioning used (empty) industrial drums. The containers can either be plastic or metal depending upon their original use and the materials stored. These materials include industrial liquids. At the facility, the containers are inspected cleaned, refurbished, leak-tested, painted, and resold. Damaged containers are crushed or chipped and sent-off for recycling.

State of Wisconsin
Department of Natural Resources

SOURCE DESCRIPTION - SUPPLEMENTAL
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102A 12-99 Information attached? N (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. List all significant existing or proposed air pollution units, operations, and activities at the facility. A short narrative of the inventory of air pollution emissions unit (e.g., boiler, printing line, etc.) followed by equipment specifications will suffice. If the facility consists of several individual emission units, present this information in an outline format. (See instruction booklet for an example Unit description.)

Pennsylvania Avenue (Only – No Norwich Avenue Operations)

Steel and Poly. Drums

Process P11: Bung Wash (Steel and Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Install: Fall 2014

Process P44: Label Stripping (Steel and Poly)
Vents to Stack S45: Fugitive
Installed: July 1995
Maximum Solvent Usage: 3.00 gal/hr (limit of 2,250 gal/yr)

Process P12: Water Heater 4 (Steel and Poly)
Vents to Stack S92 *and* Control C10: Caustic Wet Scrubber / Stack S98
Install: Fall 2014
Maximum Heat Input Rate: 2.00 mmBtu/hr

Process P13: Oil/Water Heater 3 (Steel and Poly)
Vents to Stack S93 *and* Control C10: Caustic Wet Scrubber / Stack S98
Install: Fall 2014
Maximum Heat Input Rate: 2.00 mmBtu/hr

Process P80A: Interior Caustic Preflush (Steel and Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Installed: June 1976

Control C10: Caustic Wet Scrubber
Vents to Stack S98
Receives Emissions from P11, P12, P13, P80A, P16, P14, P80B, P80C, P15, P42, P41, P95, P71, P72, P73, P74, C70, (non-identified processes: Settling Tank 1, Settling Tank 2, Oil Water Separator, Used Oil Tank, Oil Treatment Tank, Poly Auto Purge 1, Poly Auto Purge 2, Water Treatment System)

Poly. Drums

Process P16: Label Remover High Pressure Washer (Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Install: Fall 2014
Maximum Solvent Usage: 3.75 gal/hr

Process P14: Caustic Heater 2 (Poly)
Vents to Stack S94 *and* Control C10: Caustic Wet Scrubber / Stack S98
Install: Fall 2014
Maximum Heat Input Rate: 3.60 mmBtu/hr

Process P80B: Exterior Wash/Soaker (Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Installed: June 1976

Process P80C: Exterior Rinse (Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Installed: June 1976

Process P15: Caustic Heater 1 and 2,000-Gallon Tank (Poly)
Vents to Stack S95 *and* Control C10: Caustic Wet Scrubber / Stack S98
Install: Fall 2014
Maximum Heat Input Rate: 2.00 mmBtu/hr

Process P42: Replacement Internal Drum Washer (Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Installed: July 1995
Modified: Fall 2014

Process P41: Drying Oven/Flamer Natural Gas Fired (Poly)
Vents to Stack S96 *and* Control C10: Caustic Wet Scrubber
Installed: July 1995
Modified: Fall 2014
Maximum Heat Input Rate: 0.60 mmBtu/hr

State of Wisconsin
Department of Natural Resources

SOURCE DESCRIPTION - SUPPLEMENTAL
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102A 12-99 Information attached? N (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. List all significant existing or proposed air pollution units, operations, and activities at the facility. A short narrative of the inventory of air pollution emissions unit (e.g., boiler, printing line, etc.) followed by equipment specifications will suffice. If the facility consists of several individual emission units, present this information in an outline format. (See instruction booklet for an example Unit description.)

Poly. Drums (continued)

Process P42C: Hot Water Heater Natural Gas Fired (Poly)
Vents to Stack S62
Installed: July 1995
Maximum Heat Input Rate: 1.75 mmBtu/hr

Process P95: Drum Caustic Pre-Flush (Poly)
Vents Only to Control C10: Caustic Wet Scrubber
Installed: July 1995
Modified: Fall 2014

Process P45: Drum Wipe Cleaning (Poly)
Vents to Stack S45: Fugitive
Installed: July 1995
Maximum Solvent Usage: 3.75 gal/hr

Steel Drums

Process P71: De-Labeling (Steel)
Vents to Stack S91: Fugitive
Install: Fall 2014
Maximum Solvent Usage: 3.0 gallons/hr

Process P72: Exterior Wash/Soaker (Steel)
Vents Only to Control C10: Caustic Wet Scrubber
Install: Fall 2014

Process P73: Exterior Rinse (Steel)
Vents Only to Control C10: Caustic Wet Scrubber
Install: Fall 2014

Steel Drums

Process P74: Internal Double Split Washer (Steel)
Vents Only to Control C10: Caustic Wet Scrubber
Install: Fall 2014

Process P75: Acidizer (Steel)
Vents to Control C70: Acid Wet Scrubber *then* Control C10: Caustic Wet Scrubber
Install: Fall 2014
Maximum 31.45% HCl Usage: 120.19 lb/hr

Process P50C: Closed Drum Drying Oven Nat. Gas Fired (Steel)
Vents to Stack S53
Installed at Norwich Ave. Location: In 2005 after fire
Move to Pennsylvania Ave. Location: Fall 2014
Maximum Heat Input Rate: 0.60 mmBtu/hr

Process P32C: Auto Exterior Drum Spray Booth (Steel)
Vents to Control C32C: Overspray Filter / Stack S12C
Installed at Norwich Ave. Location: In 2005 after fire
Move to Pennsylvania Ave. Location: Fall 2014
Maximum Paint Usage: 11.60 gal/hr

Process P32B: Curing Oven Natural Gas Fired (Steel)
Vents to Stack S12B
Installed at Norwich Ave. Location: In 2005 after fire
Move to Pennsylvania Ave. Location: Fall 2014
Maximum Heat Input Rate: 2.60 mmBtu/hr

For Renewal Applications:

N/A

1. If there were any new or modified emissions units installed/modified at the facility since the last operation permit issuance date:
   a. If any of these new/modified units were exempt from construction permit requirements, but ....
   b. If any of the new/modified units are insignificant emissions units list them on form 4530-102B.
   c. If any of the new/modified emissions units do not fit any of the above categories, fill out ... as follows:
      i. For Part 70 Sources: Fill out the appropriate forms 4530-103 through 4530-133; OR
      ii. For Synthetic Minor Non Part-70 Sources and Non-Part 70 Sources: Fill out the appropriate forms 4530-103 through 4530-117 and 4530-126 through 4530-129.

State of Wisconsin
Department of Natural Resources

SOURCE DESCRIPTION - SUPPLEMENTAL
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102B 12-99 Information attached? N (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. Mark all insignificant existing or proposed air pollution units, operations, and activities at the facility listed below. If not listed, provide a short narrative of the inventory of air pollution emissions unit (e.g., boiler, printing line, etc.) followed by equipment specifications. If the facility consists of several individual emission units, present this information in an outline format. **For Renewal Applications, identify those that are new since the last update to your application.** (See instruction booklet for an example Unit description.)

☒ Maintenance of Grounds, Equipment, and Buildings (lawn care, painting, etc.)

☐ Boiler, Turbine, and HVAC System Maintenance

☒ Pollution Control Equipment Maintenance

☒ Internal Combustion Engines Used for Warehousing and Material Transport

☐ Fire Control Equipment

☒ Janitorial Activities

☒ Office Activities

☒ Convenience Water Heating

☒ Convenience Space Heating (< 5 million BTU/hr Burning Gas, Liquid, or Wood)

☐ Fuel Oil Storage Tanks (< 10,000 gal.)

☐ Stockpiled Contaminated Soils

☐ Demineralization and Oxygen Scavenging of Water for Boilers

☐ Purging of Natural Gas Lines

☒ Sanitary Sewer and Plumbing Venting

☒ Fiber Drum Cleaning / Drum Cleaning

☒ Vacuum – Closed Drum Blaster

☒ Rotary Barrel Washing Operation

☒ Barrel Inside Air Purge

☒ Process P76: Shotblaster (Steel)
Control C76: Baghouse
Vents Indoors
Install: Fall 2014
Maximum Usage: 300 drums/hr

☒ Other Non-Emissions Processes Venting to C10: Settling Tank 1, Settling Tank 2, Oil Water Separator, Used Oil Tank, Oil Treatment Tank, Poly Auto Purge 1, Poly Auto Purge 2, Water Treatment System

State of Wisconsin
Department of Natural Resources

STACK IDENTIFICATION
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-103 · 11-93

Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name:	2. Facility identification number:	3. Stack identification number:
MASD / Kitzinger	241063570	See Attached Table 17

4. Exhausting Unit(s), use Unit identification number from appropriate Form(s) 4530-104, 106, 107, 108 and/or 109

4530-104 4530-106 4530-107 4530-108 4530-109

5. Identify this stack on the plot plan required on Form 4530-101

6. Indicate by checking:
☐ This stack has an actual exhaust point. ☐ This stack serves to identify fugitive emissions.

If this stack has an actual exhaust point, then provide the following stack parameters

7. Discharge height above ground level: ____ (feet)

8. Inside dimensions at outlet (check one and complete):

☐ Circular ____ (feet) ☐ rectangular ____ length (feet) ____ width (feet)

9. Exhaust flow rate:

Normal __ (ACFM) Maximum _ (ACFM)

10. Exhaust gas temperature (normal): ___ (EF)

11. Exhaust gas moisture content: Normal ____ volume percent Maximum ____ volume percent

12. Exhaust gas discharge direction: ☐ Up ☐ Down ☐ Horizontal

13. Is this stack equipped with a rainhat or any obstruction to the free flow of the exhaust gases from the stack? ☐ Yes ☐ No

***** Complete the appropriate Air Permit Application Forms(s) 4530-104, 106, 107, 108 or 109 for each Unit ***** exhausting through this stack.

State of Wisconsin
Department of Natural Resources

PAINTING AND COATING OPERATIONS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-108 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger | 2. Facility identification number: 241063570

3. Stack identification number: S12C through C32C | 4. Process number: P32C

4a. Unit description: Auto Exterior Drum Spray Booth

5. Indicate the control technology status. ☐ Uncontrolled ☒ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 C32C 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117

6. Application technique and transfer efficiency (%): Airless Lance, 50% Transfer Efficiency

7. Date of construction or last modification: Installed at Norwich Ave. Location: In 2005 after fire
Move to Pennsylvania Ave. Location: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Oven curing (complete if applicable):
Number of ovens N/A Specify oven fuels ____
Total Maximum Energy input to each oven:

10. Describe all of the coatings' and solvents' composition (as applied) that are used by this unit.

Name of coating a.	ct cg b.	T c.	Maximum usage d.		Normal usage e.	Solids % f.		VOC % g.		Water % h.		Coating or VOC Density i.	Pounds VOC/ gallon less H_2O j.
			gal/hr	gal/yr	gal/yr	W	V	W	V	W	V	lbs/gal	
See attached Table 18 for a summary of typical coatings with VOC contents													
Paints	3		11.60	48,256	11,500								
Total coatings													
List the thinning solvents used with the coatings identified above.													
Clean-up solvents Acetone			2.85			0		0		0		0	
Clean-up solvents													
Other (specify)													

***** For this emissions unit, identify the method of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

Coating categories (ct. cg. - column b. above) should be entered as follows: 1 - for air dried coatings; 2 - for clear coatings; 3 - for cured coatings; 4 - for extreme performance coatings; 5 - for other (specify)

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S98 through C10	4. Process number: P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A (per one of two units), P80C, P95

4a. Unit description: Processes venting to new Wet Caustic Scrubber

5. Indicate the control technology status. ☐ Uncontrolled ☒ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 X 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Processes venting to new Wet Caustic Scrubber	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units
Caustic (NaOH) (all units combined)	Stored in Drums	215,000	lb/yr	123.08	lb/hr
				512,000	lb/yr

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage:

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger
2. Facility identification number: 241063570
3. Stack identification number: S44 (Fugitive)
4. Process number: P44

4a. Unit description: Label Stripping

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117

6. Source Classification Code (SCC):

7. Date of construction or last modification: July 1995

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process).
Label Stripping
Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units
Solvent (potentially with methylene chloride)	Stored in drums	1,375	gal/yr	2,250	gal/yr
				3.00	gal/hr

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: N/A

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
None					

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A
Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S92	4. Process number: P12

4a. Unit description: Water Heater 4 (combustion emissions)

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Water Heater 4 (combustion emissions)	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
Natural Gas	2.0	8.32	$mmft^3/yr$	17.52	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger
2. Facility identification number: 241063570
3. Stack identification number: S93
4. Process number: P13

4a. Unit description: Oil/Water Heater 3 (combustion emissions)

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process).
Oil/Water Heater 3 (combustion emissions)
Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr	Average usage	Units	Maximum usage	Units
Natural Gas	2.0	8.32	$mmft^3/yr$	17.52	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A
Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S94	4. Process number: P14

4a. Unit description: Caustic Heater 2 (combustion emissions)

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Caustic Heater 2 (combustion emissions)	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
Natural Gas	3.6	14.98	$mmft^3/yr$	31.54	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S95	4. Process number: P15

4a. Unit description: Caustic Heater 1 and 2,000-Gallon Tank (combustion emissions)

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Caustic Heater 1 and 2,000-Gallon Tank (combustion emissions)	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr	Average usage	Units	Maximum usage	Units
Natural Gas	2.0	8.32	$mmft^3/yr$	17.52	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S96	4. Process number: P41

4a. Unit description: Drying Oven/Flamer (combustion emissions)

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Installed: July 1995, Modified: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Drying Oven/Flamer (combustion emissions)	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
Natural Gas	0.6	2.50	$mmft^3/yr$	5.26	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger
2. Facility identification number: 241063570
3. Stack identification number: S62
4. Process number: P42C
4a. Unit description: Hot Water Heater
5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____
6. Source Classification Code (SCC):
7. Date of construction or last modification: July 1995
8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr
9. Describe this process (please attach a flow diagram of the process).
Hot Water Heater
Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr	Average usage	Units	Maximum usage	Units
Natural Gas	1.75	7.28	$mmft^3/yr$	15.33	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A
Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S45 (Fugitive)	4. Process number: P45

4a. Unit description: Drum Wipe Cleaning

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117

6. Source Classification Code (SCC):

7. Date of construction or last modification: July 1995

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Drums are solvent cleaned prior to shipping	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units
Solvent (non-methylene chloride)	Stored in drums	5,200	gal/yr	7,800	gal/yr
				3.75	gal/hr

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: N/A

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
None					

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger
2. Facility identification number: 241063570
3. Stack identification number: S91 (Fugitive)
4. Process number: P71
4a. Unit description: De-Labeling
5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117
6. Source Classification Code (SCC):
7. Date of construction or last modification: Fall 2014
8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr
9. Describe this process (please attach a flow diagram of the process). Attached? Yes
De-Labeling

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units
Solvent (non-methylene chloride)	Stored in drums	5,200	gal/yr	7,800	gal/yr
				3.75	gal/hr

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: N/A

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
None					

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A
Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S97 through C70	4. Process number: P75

4a. Unit description: Acidizer venting to Wet Acid Scrubber

5. Indicate the control technology status. ☐ Uncontrolled ☒ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 X 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Acidizer venting to Wet Acid Scrubber	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units
20 Degrees Baume / 31.45% Concentrated Hydrochloric Acid	Stored in Drums	192,400	lb/yr	120.19	lb/hr
				500,000	lb/yr

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: N/A

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger
2. Facility identification number: 241063570
3. Stack identification number: S53
4. Process number: P50C
4a. Unit description: Closed Drum Drying Oven
5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____
6. Source Classification Code (SCC):
7. Date of construction or last modification: Installed at Norwich Ave. Location: In 2005 after fire, Move to Pennsylvania Ave. Location: Fall 2014
8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr
9. Describe this process (please attach a flow diagram of the process). Closed Drum Drying Oven — Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr	Average usage	Units	Maximum usage	Units
Natural Gas	0.6	2.50	$mmft^3/yr$	5.26	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A — Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

MISCELLANEOUS PROCESSES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-109 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12B	4. Process number: P32B

4a. Unit description: Curing Oven

5. Indicate the control technology status. ☒ Uncontrolled ☐ Controlled
If the process is controlled, enter the control device number(s) from the appropriate form(s):
4530-110 ____ 4530-111 ____ 4530-112 ____ 4530-113 ____
4530-114 ____ 4530-115 ____ 4530-116 ____ 4530-117 ____

6. Source Classification Code (SCC):

7. Date of construction or last modification: Installed at Norwich Ave. Location: In 2005 after fire, Move to Pennsylvania Ave. Location: Fall 2014

8. Normal operating schedule: 16 hrs/day 5 days/wk 260 days/yr

9. Describe this process (please attach a flow diagram of the process). Curing Oven	Attached? Yes

10. List the types and amounts of raw materials used in this process:

Material	Storage/material handling process	Average usage	Units	Maximum usage	Units

11. List the types and amounts of finished products:

Material	Storage/material handling process	Average amount produced	Units	Maximum amount produced	Units
Drums	Transported via conveyor	300,000	drums/yr	300	drums/hr

12. Process fuel usage: Natural Gas

Type of fuel	Maximum heat input to process million BTU/hr.	Average usage	Units	Maximum usage	Units
Natural Gas	2.6	10.82	$mmft^3/yr$	22.78	$mmft^3/yr$

13. Describe any fugitive emissions associated with this process, such as outdoor storage piles, unpaved roads, open conveyors, etc.: N/A	Attached? N/A

***** For this emissions unit, identify the method(s) of compliance demonstration by completing Form 4530-118, ***** DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE. Attach Form 4530-118 and its attachment(s) to this form. This is not a requirement of non-Part 70 sources.

***** Please complete the Air Pollution Control Permit Application Forms 4530-126 and 4530-128 for this Unit. *****

State of Wisconsin
Department of Natural Resources

CONTROL EQUIPMENT MISCELLANEOUS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-110 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12C	4. Unit identification number: P32C
5. Control device number: C32C	

6. Manufacturer and model number: Chemco Mfg. Co., Chemco Duo-Pads (Dry Filter) or similar

7. Date of installation: Installed at Norwich Ave. Location: In 2005 after fire
Move to Pennsylvania Ave. Location: Fall 2014

8. Describe in detail the device in use. Attach a diagram of the system. Attached? Yes
The control systems consist of standard dry filters

9. List the pollutants to be controlled by this equipment and the expected control efficiency for each pollutant on the table below.
☐ Documentation is attached?

Pollutant	Inlet pollutant concentration		Hood capture efficiency (%)	Outlet pollutant concentration		Efficiency (%)
	gr/acf	ppmv		gr/acf	ppmv	
Particulate Matter	N/A	N/A	100%	N/A	N/A	98%

10. Discuss how the collected material will be handled for reuse or disposal.
The paint filters are incinerated, and the water from the wash filters are sent to wastewater

11. Prepare a malfunction prevention and abatement plan (if required under s. NR 439.11) for this pollution control system. Please include the following:

a. Identification of the individuals(s), by title, responsible for inspecting, maintaining and repairing this device.
b. Operation variables such as temperature that will be monitored in order to detect a malfunction or breakthrough, the correct operating range of these variables, and a detailed description of monitoring or surveillance procedures that will be used to show compliance.
c. What type of monitoring equipment will be provided (temperature sensors, pressure sensors, CEMs).
d. An inspection schedule and items or conditions that will be inspected.
e. A listing of materials and spare parts that will be maintained in inventory.
f. Is this plan available for review? Yes, see Attachment with December 2008 application

State of Wisconsin
Department of Natural Resources

CONTROL EQUIPMENT-WET COLLECTION SYSTEMS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-116 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

Section A

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S98	4. Unit identification number P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95
5. Control device number C70	

6. Manufacturer and model number IES 45,000 CFM Caustic Wash Scrubber

7. Date of installation Fall 2014

8. Describe in detail the control system. Attach a blueprint or diagram of the system. Attached? Yes
The pollutant (NaOH) is ducted to the scrubber where it is absorbed into the liquid stream. The pH is maintained between 5 and 9 by adding either NaOH or HCl as needed.

9. List the pollutants to be controlled by this equipment and the expected control efficiency for each pollutant on the table below.
☐ Documentation is attached

Pollutant	Inlet pollutant concentration		Outlet pollutant concentration		Efficiency (%)
	gr/acf	ppmv	gr/acf	ppmv	
NaOH	N/A	N/A	N/A	N/A	0 % (95% is true efficiency, but due to not wanting permit constraints, MASD is having the scrubber permitted at 0%)

10. Discuss how the collected material will be handled for reuse or disposal.
The collected material is disposed of as wastewater after being neutralized to a pH of between 5 and 9.

11. Prepare a malfunction prevention and abatement plan (if required under s. NR 439.11) for this pollution control system. Please include the following:
a. Identification of the individuals(s), by title, responsible for inspecting, maintaining and repairing this device.
b. Operation variables that will be monitored in order to detect a malfunction or breakthrough, the correct operating range of these variables, and a detailed description of monitoring or surveillance procedures that will be used to show compliance.
c. An inspection schedule and items or conditions that will be inspected.
d. A listing of materials and spare parts that will be maintained in inventory.
e. Is this plan available for review? Yes

Section B

The following questions must be answered by sources installing new equipment or existing Units which cannot document control efficiency of this device by other means.

12. Liquid flow rate (~~gal/min~~): 124.94 lb/hr	13. Pressure drop across the scrubber and demister (inches of H_2O): 2 – 10 inches H_2O
14. Inlet gas flow rate (ACFM): 45,000	15. Inlet gas temperature (EF): 70
16. Scrubbing medium (water, sodium hydroxide slurry, etc.): Water	17. Liquid inlet pressure (psi): 80

State of Wisconsin
Department of Natural Resources

CONTROL EQUIPMENT-WET COLLECTION SYSTEMS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-116 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

Section A

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S97	4. Unit identification number P75
5. Control device number C70	

6. Manufacturer and model number IES 4,000 CFM Acid Wash Scrubber

7. Date of installation Fall 2014

8. Describe in detail the control system. Attach a blueprint or diagram of the system. Attached? Yes
The pollutant (HCl) is ducted to the scrubber where it is absorbed into the liquid stream. The pH is maintained between 5 and 9 by adding either NaOH or HCl as needed.

9. List the pollutants to be controlled by this equipment and the expected control efficiency for each pollutant on the table below.
☐ Documentation is attached

Pollutant	Inlet pollutant concentration		Outlet pollutant concentration		Efficiency (%)
	gr/acf	ppmv	gr/acf	ppmv	
HCl	N/A	N/A	N/A	N/A	0 % (95% is true efficiency, but due to not wanting permit constraints, MASD is having the scrubber permitted at 0%)

10. Discuss how the collected material will be handled for reuse or disposal.
The collected material is disposed of as wastewater after being neutralized to a pH of between 5 and 9.

11. Prepare a malfunction prevention and abatement plan (if required under s. NR 439.11) for this pollution control system. Please include the following:
a. Identification of the individuals(s), by title, responsible for inspecting, maintaining and repairing this device.
b. Operation variables that will be monitored in order to detect a malfunction or breakthrough, the correct operating range of these variables, and a detailed description of monitoring or surveillance procedures that will be used to show compliance.
c. An inspection schedule and items or conditions that will be inspected.
d. A listing of materials and spare parts that will be maintained in inventory.
e. Is this plan available for review? Yes

Section B

The following questions must be answered by sources installing new equipment or existing Units which cannot document control efficiency of this device by other means.

12. Liquid flow rate (~~gal/min~~): 11.11 lb/hr	13. Pressure drop across the scrubber and demister (inches of H_2O): 2 – 10 inches H_20
14. Inlet gas flow rate (ACFM): 4,000	15. Inlet gas temperature (EF): 70
16. Scrubbing medium (water, sodium hydroxide slurry, etc.): Water	17. Liquid inlet pressure (psi): 80

State of Wisconsin
Department of Natural Resources

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE
Form 4530-118 11-93 Information attached? N (y/n)

All applicants except non-Part 70 sources are required to certify compliance with all applicable air pollution permit requirements by including a statement within the permit application of the methods used for determining compliance (please see sec. NR 407.05(4)(i), Wis. Adm. Code.) This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually, and may need to be more frequent if specified by the underlying applicable requirement or by the Department.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S92, S93, S94, S95, S96, S62, S53, S12B	4. Unit identification number: P12, P13, P14, P15, P41, P42C, P50C, P32B

5. This Unit will use the following method(s) for determining compliance with the requirements of the permit (check all that apply and attach the appropriate form(s) to this form).

☐ Continuous Emission Monitoring (CEM) - Form 4530-119
Pollutant(s):

☐ Periodic Emission Monitoring Using Portable Monitors - Form 4530-120
Pollutant(s):

☐ Monitoring Control System Parameters or Operating Parameters of a Process - Form 4530-121
Pollutant(s):

☐ Monitoring Maintenance Procedures - Form 4530-122
Pollutant(s):

☐ Stack Testing - Form 4530-123
Pollutant(s):

☐ Fuel Sampling and Analysis (FSA) - Form 4530-124
Pollutant(s):

☒ Recordkeeping - Form 4530-125
Pollutant(s): NOx, SO2, CO, PM, VOC

☐ Other (please describe) - Form 4530-135
Pollutant(s):

6. Compliance certification reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the calendar year after issuance of this permit and every 12 months thereafter.

Compliance monitoring reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the first half of the calendar year after issuance of this permit and every 6 months thereafter.

State of Wisconsin
Department of Natural Resources

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE
Form 4530-118 11-93 Information attached? N (y/n)

All applicants except non-Part 70 sources are required to certify compliance with all applicable air pollution permit requirements by including a statement within the permit application of the methods used for determining compliance (please see sec. NR 407.05(4)(i), Wis. Adm. Code.) This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually, and may need to be more frequent if specified by the underlying applicable requirement or by the Department.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S98	4. Unit identification number C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95)

5. This Unit will use the following method(s) for determining compliance with the requirements of the permit (check all that apply and attach the appropriate form(s) to this form).

☐ Continuous Emission Monitoring (CEM) - Form 4530-119
Pollutant(s):

☐ Periodic Emission Monitoring Using Portable Monitors - Form 4530-120
Pollutant(s):

☒ Monitoring Control System Parameters or Operating Parameters of a Process - Form 4530-121
Pollutant(s): NaOH

☐ Monitoring Maintenance Procedures - Form 4530-122
Pollutant(s):

☐ Stack Testing - Form 4530-123
Pollutant(s):

☐ Fuel Sampling and Analysis (FSA) - Form 4530-124
Pollutant(s):

☒ Recordkeeping - Form 4530-125
Pollutant(s): NaOH

☐ Other (please describe) - Form 4530-135
Pollutant(s):

6. Compliance certification reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the calendar year after issuance of this permit and every 12 months thereafter.

Compliance monitoring reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the first half of the calendar year after issuance of this permit and every 6 months thereafter.

State of Wisconsin
Department of Natural Resources

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE
Form 4530-118 11-93 Information attached? N (y/n)

All applicants except non-Part 70 sources are required to certify compliance with all applicable air pollution permit requirements by including a statement within the permit application of the methods used for determining compliance (please see sec. NR 407.05(4)(i), Wis. Adm. Code.) This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually, and may need to be more frequent if specified by the underlying applicable requirement or by the Department.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S97	4. Unit identification number C70 (P75)

5. This Unit will use the following method(s) for determining compliance with the requirements of the permit (check all that apply and attach the appropriate form(s) to this form).

☐ Continuous Emission Monitoring (CEM) - Form 4530-119
Pollutant(s):

☐ Periodic Emission Monitoring Using Portable Monitors - Form 4530-120
Pollutant(s):

☒ Monitoring Control System Parameters or Operating Parameters of a Process - Form 4530-121
Pollutant(s): HCl

☐ Monitoring Maintenance Procedures - Form 4530-122
Pollutant(s):

☐ Stack Testing - Form 4530-123
Pollutant(s):

☐ Fuel Sampling and Analysis (FSA) - Form 4530-124
Pollutant(s):

☒ Recordkeeping - Form 4530-125
Pollutant(s):HCl

☐ Other (please describe) - Form 4530-135
Pollutant(s):

6. Compliance certification reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the calendar year after issuance of this permit and every 12 months thereafter.

Compliance monitoring reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the first half of the calendar year after issuance of this permit and every 6 months thereafter.

State of Wisconsin
Department of Natural Resources

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE
Form 4530-118 11-93 Information attached? N (y/n)

All applicants except non-Part 70 sources are required to certify compliance with all applicable air pollution permit requirements by including a statement within the permit application of the methods used for determining compliance (please see sec. NR 407.05(4)(i), Wis. Adm. Code.) This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually, and may need to be more frequent if specified by the underlying applicable requirement or by the Department.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12C	4. Unit identification number: C32C (P32C)

5. This Unit will use the following method(s) for determining compliance with the requirements of the permit (check all that apply and attach the appropriate form(s) to this form).

☐ Continuous Emission Monitoring (CEM) - Form 4530-119
Pollutant(s):

☐ Periodic Emission Monitoring Using Portable Monitors - Form 4530-120
Pollutant(s):

☒ Monitoring Control System Parameters or Operating Parameters of a Process - Form 4530-121
Pollutant(s): PM

☐ Monitoring Maintenance Procedures - Form 4530-122
Pollutant(s):

☐ Stack Testing - Form 4530-123
Pollutant(s):

☐ Fuel Sampling and Analysis (FSA) - Form 4530-124
Pollutant(s):

☒ Recordkeeping - Form 4530-125
Pollutant(s): PM, VOC, HAPs

☐ Other (please describe) - Form 4530-135
Pollutant(s):

6. Compliance certification reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the calendar year after issuance of this permit and every 12 months thereafter.

Compliance monitoring reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the first half of the calendar year after issuance of this permit and every 6 months thereafter.

State of Wisconsin
Department of Natural Resources

COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE
Form 4530-118 11-93 Information attached? N (y/n)

All applicants except non-Part 70 sources are required to certify compliance with all applicable air pollution permit requirements by including a statement within the permit application of the methods used for determining compliance (please see sec. NR 407.05(4)(i), Wis. Adm. Code.) This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually, and may need to be more frequent if specified by the underlying applicable requirement or by the Department.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S44, S45, S91	4. Unit identification number: P44, P45, P71

5. This Unit will use the following method(s) for determining compliance with the requirements of the permit (check all that apply and attach the appropriate form(s) to this form).

☐ Continuous Emission Monitoring (CEM) - Form 4530-119
Pollutant(s):

☐ Periodic Emission Monitoring Using Portable Monitors - Form 4530-120
Pollutant(s):

☐ Monitoring Control System Parameters or Operating Parameters of a Process - Form 4530-121
Pollutant(s):

☐ Monitoring Maintenance Procedures - Form 4530-122
Pollutant(s):

☐ Stack Testing - Form 4530-123
Pollutant(s):

☐ Fuel Sampling and Analysis (FSA) - Form 4530-124
Pollutant(s):

☒ Recordkeeping - Form 4530-125
Pollutant(s): VOC, HAPs

☐ Other (please describe) - Form 4530-135
Pollutant(s):

6. Compliance certification reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the calendar year after issuance of this permit and every 12 months thereafter.

Compliance monitoring reports will be submitted to the Department according to the following schedule:
Start date: Following the end of the first half of the calendar year after issuance of this permit and every 6 months thereafter.

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS AIR POLLUTION CONTROL PERMIT APPLICATION

Form 4530-121 11-93

Information attached? N (y/n)

The monitoring of a control system parameter or a process may be acceptable as a compliance demonstration method provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. Ideally three sets of stack test data, that bracket the emission limit if possible, could be used to define the emission curve. This correlation shall constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12C	4. Unit identification number: C32C (P32C)
5. Pollutant(s) being monitored: PM	
6. Name of manufacturer: Dwyer	7. Model number: Magnahelic
8. Is this an existing system? ☒ Yes ☐ No	9. Installation date: 1995/2014

10. Method of monitoring description:
The pressure drop is recorded once every day or 24 hours of operation.

11. Backup system: None

12. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

13. The applicant shall propose an appropriate averaging period, (i.e., a particular number of continuous hours) for the purpose of defining excess emissions. The Department may approve the proposed averaging period, or other period which the Department determines to be appropriate. Provide the proposed averaging period(s) below.

Parameter	Averaging Period
Pressure Drop Across the Dry Filter	Daily

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-121 11-93 Information attached? N (y/n)

The monitoring of a control system parameter or a process may be acceptable as a compliance demonstration method provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. Ideally three sets of stack test data, that bracket the emission limit if possible, could be used to define the emission curve. This correlation shall constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S98	4. Unit identification number C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95)

5. Pollutant(s) being monitored: NaOH

6. Name of manufacturer: IES	7. Model number:
8. Is this an existing system? ☐ Yes ☒ No	9. Installation date: Fall 2014

10. Method of monitoring description:
When in operation, the pressure drop across the scrubber and the pH of the water will be recorded once per day of operation

11. Backup system: None

12. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

13. The applicant shall propose an appropriate averaging period, (i.e., a particular number of continuous hours) for the purpose of defining excess emissions. The Department may approve the proposed averaging period, or other period which the Department determines to be appropriate. Provide the proposed averaging period(s) below.

Parameter	Averaging Period
Differential Across the Scrubber	Daily
Water (system) pH	Daily

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS AIR POLLUTION CONTROL PERMIT APPLICATION

Form 4530-121 11-93

Information attached? N (y/n)

The monitoring of a control system parameter or a process may be acceptable as a compliance demonstration method provided that a correlation between the parameter value and the emission rate of a particular pollutant is established in the form of a curve of emission rate versus parameter values. Ideally three sets of stack test data, that bracket the emission limit if possible, could be used to define the emission curve. This correlation shall constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S97	4. Unit identification number C70 (P75)
5. Pollutant(s) being monitored: HCl	
6. Name of manufacturer: IES	7. Model number:
8. Is this an existing system? ☐ Yes ☒ No	9. Installation date: Fall 2014

10. Method of monitoring description:
When in operation, the pressure drop across the scrubber and the pH of the water will be recorded once per day of operation

11. Backup system: None

12. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

13. The applicant shall propose an appropriate averaging period, (i.e., a particular number of continuous hours) for the purpose of defining excess emissions. The Department may approve the proposed averaging period, or other period which the Department determines to be appropriate. Provide the proposed averaging period(s) below.

Parameter	Averaging Period
Differential Across the Scrubber	Daily
Water (system) pH	Daily

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY RECORDKEEPING
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-125 11-93 Information attached? _N_ (y/n)

Recordkeeping may be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the emission rate of a particular pollutant is established in the form of a curve or chart of emission rate versus parameter values. This correlation may constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S92, S93, S94, S95, S96, S62, S53 S12B	4. Unit identification number: P12, P13, P14, P15, P41, P42C, P50C, P32B
5. Pollutant(s) being monitored: NOx, SO2, CO, PM, VOC	6. Material or parameter being monitored and recorded: Natural Gas Usage

7. Method of monitoring and recording:
The facility wide natural gas usage will be recorded monthly.

8. List any EPA methods used: None

9. Is this an existing method of demonstrating compliance? ☒ Yes ☐ No	10. Installation date: various – see above forms

11. Backup system: Purchasing Records

12. Compliance shall be demonstrated: ☐ Daily ☐ Weekly ☒ Monthly ☐ Batch (not to exceed monthly)

13. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

***** The compliance records shall be available for Department inspection. The format for the compliance ***** certification report and the excess emission report shall be approved by the Department. A proposed format for the compliance certification report and excess emission report shall be submitted at the same time as the application.

***** The source shall record any malfunction that causes or may cause an emission limit to be exceeded. ***** Malfunctions shall be reported to the Department the next business day. Hazardous air spills shall be reported to the Department immediately.

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY RECORDKEEPING
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-125 11-93

Information attached? N (y/n)

Recordkeeping may be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the emission rate of a particular pollutant is established in the form of a curve or chart of emission rate versus parameter values. This correlation may constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12C	4. Unit identification number: C32C (P32C)
5. Pollutant(s) being monitored: PM, VOCs, and HAPs	6. Material or parameter being monitored and recorded: Coating Throughput

7. Method of monitoring and recording:
The facility will record the coating throughput monthly. The coating compositions will be taken from the Material Safety Data Sheets. Coating throughput will be the total usage for Processes all-P32, P35, all-P36, and P65.

8. List any EPA methods used: None

9. Is this an existing method of demonstrating compliance? ☒ Yes ☐ No	10. Installation date: 1995/2014

11. Backup system: Purchasing Records

12. Compliance shall be demonstrated: ☐ Daily ☐ Weekly ☒ Monthly ☐ Batch (not to exceed monthly)

13. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

***** The compliance records shall be available for Department inspection. The format for the compliance ***** certification report and the excess emission report shall be approved by the Department. A proposed format for the compliance certification report and excess emission report shall be submitted at the same time as the application.

***** The source shall record any malfunction that causes or may cause an emission limit to be exceeded. ***** Malfunctions shall be reported to the Department the next business day. Hazardous air spills shall be reported to the Department immediately.

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY RECORDKEEPING
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-125 11-93

Information attached? N (y/n)

Recordkeeping may be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the emission rate of a particular pollutant is established in the form of a curve or chart of emission rate versus parameter values. This correlation may constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S44, S45, S91	4. Unit identification number: P44, P45, P71
5. Pollutant(s) being monitored: VOC, HAPs	6. Material or parameter being monitored and recorded: HAP and VOC Usage

7. Method of monitoring and recording:
The facility will record the amount of solvents used monthly.

8. List any EPA methods used: None

9. Is this an existing method of demonstrating compliance? ☒ Yes ☐ No	10. Installation date: 1995/2014

11. Backup system: Purchasing Records

12. Compliance shall be demonstrated: ☐ Daily ☐ Weekly ☒ Monthly ☐ Batch (not to exceed monthly)

13. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

***** The compliance records shall be available for Department inspection. The format for the compliance ***** certification report and the excess emission report shall be approved by the Department. A proposed format for the compliance certification report and excess emission report shall be submitted at the same time as the application.

***** The source shall record any malfunction that causes or may cause an emission limit to be exceeded. ***** Malfunctions shall be reported to the Department the next business day. Hazardous air spills shall be reported to the Department immediately.

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY RECORDKEEPING
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-125 11-93

Information attached? N (y/n)

Recordkeeping may be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the emission rate of a particular pollutant is established in the form of a curve or chart of emission rate versus parameter values. This correlation may constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S98	4. Unit identification number C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95)
5. Pollutant(s) being monitored: NaOH	6. Material or parameter being monitored and recorded: NaOH Usage

7. Method of monitoring and recording:
The facility will record the amount of NaOH used monthly.

8. List any EPA methods used: None

9. Is this an existing method of demonstrating compliance? ☐ Yes ☒ No	10. Installation date: Fall 2014

11. Backup system: Purchasing Records

12. Compliance shall be demonstrated: ☐ Daily ☐ Weekly ☒ Monthly ☐ Batch (not to exceed monthly)

13. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

***** The compliance records shall be available for Department inspection. The format for the compliance ***** certification report and the excess emission report shall be approved by the Department. A proposed format for the compliance certification report and excess emission report shall be submitted at the same time as the application.

***** The source shall record any malfunction that causes or may cause an emission limit to be exceeded. ***** Malfunctions shall be reported to the Department the next business day. Hazardous air spills shall be reported to the Department immediately.

State of Wisconsin
Department of Natural Resources

COMPLIANCE DEMONSTRATION BY RECORDKEEPING
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-125 11-93

Information attached? _N_ (y/n)

Recordkeeping may be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the emission rate of a particular pollutant is established in the form of a curve or chart of emission rate versus parameter values. This correlation may constitute the certification of the system. It should be attached for Department approval. If it is not attached, please submit it within 60 days of the startup of the system.

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S97	4. Unit identification number C70 (P75)
5. Pollutant(s) being monitored: HCl	6. Material or parameter being monitored and recorded: HCl Usage

7. Method of monitoring and recording:
The facility will record the amount of HCl used monthly.

8. List any EPA methods used: None

9. Is this an existing method of demonstrating compliance? ☐ Yes ☒ No	10. Installation date: Fall 2014

11. Backup system: Purchasing Records

12. Compliance shall be demonstrated: ☐ Daily ☐ Weekly ☒ Monthly ☐ Batch (not to exceed monthly)

13. Indicate by checking:

The monitoring system shall be subject to appropriate performance specifications, calibration requirements and quality assurance procedures. ☐ A quality assurance/quality control plan for the monitoring system is attached for Department approval. ☐ If the plan is not attached, please submit it within 60 days of the start-up of the monitoring program. ☒ The plan was submitted to the Department with the original application.

***** The compliance records shall be available for Department inspection. The format for the compliance ***** certification report and the excess emission report shall be approved by the Department. A proposed format for the compliance certification report and excess emission report shall be submitted at the same time as the application.

***** The source shall record any malfunction that causes or may cause an emission limit to be exceeded. ***** Malfunctions shall be reported to the Department the next business day. Hazardous air spills shall be reported to the Department immediately.

State of Wisconsin
Department of Natural Resources

EMISSION UNIT HAZARDOUS AIR POLLUTANT SUMMARY
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-126 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: All	4. Unit identification number: All

5. Unit material description: All

6. Complete the following summary of hazardous air emissions from this unit. Attach sample calculations and emission factor references. Attached? Yes

Pollutant CAS	Actual emissions	Units	Maximum theoretical emissions	Units	Potential to emit	
Glycol Ethers, N/A	See following sheet and Tables 2, 3, 11, 12, 15					TPY
Methylene Chloride, 75-09-2						TPY
Methanol, 67-56-1						TPY
Toluene, 108-88-3						TPY
Sodium Hydroxide (mist), 1310-73-2						TPY
Hydrochloric Acid (mist), 7647-01-0						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY
						TPY

* None indicates that the emissions are below the reporting thresholds found in Table 2, Chapter NR 407

State of Wisconsin
Department of Natural Resources

FACILITY HAZARDOUS AIR POLLUTANT SUMMARY
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-127 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger | 2. Facility identification number: 241063570

3. Complete the following emissions summary for all hazardous air emissions at this facility (as defined in ch. NR 445, Wis Adm. Code, and sec. 112, 1990 Clean Air Act Amendments):

Pollutant CAS	Actual emissions		Maximum theoretical emissions		Potential to emit	
		Units		Units		
Glycol Ethers, N/A	See following sheet and Table 1					
Methylene Chloride, 75-09-2						
Methanol, 67-56-1						
Toluene, 108-88-3						
Sodium Hydroxide (mist), 1310-73-2						
Hydrochloric Acid (mist), 7647-01-0						
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY
		TPY		TPY		TPY

Attachment to Forms 4530-126 and -127
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

Pollutant CAS	Actual emissions		Maximum theoretical emissions		Potential to emit	
		Units		Units		
S98/C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95, C70, Other Units)						
Sodium Hydroxide (mist), 1310-73-2	0.02	ton/yr	0.62	lb/hr	1.28	ton/yr
S44 (fugitive)/P44						
Methylene Chloride, 75-09-2	5.87	ton/yr	25.76	lb/hr	9.66	ton/yr
Methanol, 67-56-1	0.83	ton/yr	3.64	lb/hr	1.36	ton/yr
Toluene, 108-88-3	0.41	ton/yr	1.82	lb/hr	0.68	ton/yr
S97/C70 (P75)						
Hydrochloric Acid (mist), 7647-01-0	0.015	ton/yr	0.38	lb/hr	0.79	ton/yr
S12C/C23C (P32C)						
Glycol Ethers, N/A	3.16	ton/yr	2.45	lb/hr	5.10	ton/yr
All Other Stacks						
None						
Total						
Glycol Ethers, N/A	3.16	ton/yr	2.45	lb/hr	5.10	ton/yr
Methylene Chloride, 75-09-2	5.87	ton/yr	25.76	lb/hr	9.66	ton/yr
Methanol, 67-56-1	0.83	ton/yr	3.64	lb/hr	1.36	ton/yr
Toluene, 108-88-3	0.41	ton/yr	1.82	lb/hr	0.68	ton/yr
Sodium Hydroxide (mist), 1310-73-2	0.02	ton/yr	0.62	lb/hr	1.28	ton/yr
Hydrochloric Acid (mist), 7647-01-0	0.015	ton/yr	0.38	lb/hr	0.79	ton/yr

State of Wisconsin
Department of Natural Resources

EMISSION UNIT SUMMARY
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-128 11-93 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: All	4. Unit identification number: All

5. Complete the following emissions summary for the following pollutants. Attach sample calculations and emission factor references. Attached? Yes

Air pollutant	Actual			Maximum theoretical emissions			Potential to emit	Maximum allowable		
		U	TPY		U	TPY			U	TPY
Particulates/PM10	See following sheet and Tables 1-16									
Sulfur dioxide										
Organic compounds										
Carbon monoxide										
Nitrogen oxides										

Units (U) should be entered as follows:

1 = lb/hr
2 = lb/mmBTU
3 = grains/dscf
4 = lb/ gallon
5 = ppmdv
6 = other (specify)
7 = other (specify)
8 = other (specify)

State of Wisconsin
Department of Natural Resources

FACILITY EMISSIONS SUMMARY
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-129 11-93 Information attached? _Y_ (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger | 2. Facility identification number: 241063570

3. Complete the following emissions summary for the listed emissions at this facility.

Air pollutant	Actual	Maximum theoretical emissions	Potential to emit	Maximum allowable
	TPY	TPY	TPY	TPY
Particulates	See following sheet and Table 1			
Sulfur dioxide				
Organic compounds				
Carbon monoxide				
Nitrogen oxides				
PM-10				

Attachment to Forms 4530-128 and -129
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

Pollutant CAS	Actual emissions			Maximum theoretical emissions			Potential to emit		Maximum Allowable		
		Units	TPY		Units	TPY				Units	TPY
S98/C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95, C70, Other Units)											
None											
All Combustion: S92/P12, S93/P13, S94/P14, S95/P15, S96/P41, S62/P42C, S53/P50C, S12B/P32B											
Volatile Organic Compounds (VOC)	0.04	lb/hr (1)	0.17	0.08	lb/hr (1)	0.36	0.36	ton/yr	0.08	lb/hr (1)	0.36
Carbon Monoxide (CO)	0.60	lb/hr (1)	2.65	1.27	lb/hr (1)	5.57	5.57	ton/yr	1.27	lb/hr (1)	5.57
Nitrogen Oxides (NO_X)	0.72	lb/hr (1)	3.15	1.52	lb/hr (1)	6.64	6.64	ton/yr	1.52	lb/hr (1)	6.64
Particulates (PM)	0.05	lb/hr (1)	0.24	0.12	lb/hr (1)	0.50	0.50	ton/yr	0.12	lb/hr (1)	0.50
Particulates-10 (PM-10)	0.05	lb/hr (1)	0.24	0.12	lb/hr (1)	0.50	0.50	ton/yr	0.12	lb/hr (1)	0.50
Sulfur Dioxide (SO_2)	0.004	lb/hr (1)	0.02	0.01	lb/hr (1)	0.04	0.04	ton/yr	0.01	lb/hr (1)	0.04
S44 (fugitive)/P44											
Volatile Organic Compounds (VOC)	2.77	lb/hr (1)	1.04	4.56	lb/hr (1)	19.97	1.71	ton/yr	4.56	lb/hr (1)	1.71
S45 (fugitive)/P45											
Volatile Organic Compounds (VOC)	0.96	lb/hr (1)	1.00	1.58	lb/hr (1)	6.90	1.64	ton/yr	1.58	lb/hr (1)	1.64
S91 (fugitive)/P71											
Volatile Organic Compounds (VOC)	0.96	lb/hr (1)	1.00	1.58	lb/hr (1)	6.90	1.64	ton/yr	1.58	lb/hr (1)	1.64
S97/C70 (P75)											
None											
S12C/C23C (P32C)											
Volatile Organic Compounds (VOC)	21.56	lb/hr (1)	44.85	34.80	lb/hr (1)	152.42	72.38	ton/yr	34.80	lb/hr (1)	72.38
Particulates (PM)	0.36	lb/hr (1)	0.74	28.65	lb/hr (1)	125.50	1.19	ton/yr	0.57	lb/hr (1)	1.19
Total											
Volatile Organic Compounds (VOC)	26.29	lb/hr (1)	48.06	42.59	lb/hr (1)	186.56	77.73	ton/yr	42.59	lb/hr (1)	77.73
Carbon Monoxide (CO)	0.60	lb/hr (1)	2.65	1.27	lb/hr (1)	5.57	5.57	ton/yr	1.27	lb/hr (1)	5.57
Nitrogen Oxides (NO_X)	0.72	lb/hr (1)	3.15	1.52	lb/hr (1)	6.64	6.64	ton/yr	1.52	lb/hr (1)	6.64
Particulates (PM)	0.41	lb/hr (1)	0.98	28.77	lb/hr (1)	126.00	1.70	ton/yr	0.69	lb/hr (1)	1.70
Particulates-10 (PM-10)	0.05	lb/hr (1)	0.24	0.12	lb/hr (1)	0.50	0.50	ton/yr	0.12	lb/hr (1)	0.50
Sulfur Dioxide (SO_2)	0.004	lb/hr (1)	0.02	0.01	lb/hr (1)	0.04	0.04	ton/yr	0.01	lb/hr (1)	0.04

State of Wisconsin
Department of Natural Resources

CURRENT EMISSIONS REQUIREMENTS AND STATUS OF UNIT
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-130 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S92, S93, S94, S95, S96, S62, S53 S12B	4. Unit identification number: P12, P13, P14, P15, P41, P42C, P50C, P32B

5. Pollutant	6. Wis. Adm. Code Wis. Stats., 40 CFR	7. State Only	8. Limitation	9. Compliance Status (in or out)
Particulate Matter	NR 415.06(3)(a) Wis. Adm. Code		General Limitations	In
Carbon Monoxide	NR 426.03 Wis. Adm. Code		General Limitations	In
Nitrogen Oxides	NR 428.03 Wis. Adm. Code		General Limitations	In
Sulfur Dioxide	NR 417.025 Wis. Adm. Code		General Limitations	In
Volatile Organic Compounds	NR 419.03 Wis. Adm. Code		General Limitations	In
Visible Emissions	NR 431.03 Wis. Adm. Code		20 Percent Opacity	In
Hazardous Air Pollutants	NR 445.03 Wis. Adm. Code	Yes	General Limitations	In

10. Other requirements (e.g., malfunction reporting, special operating conditions from an existing permit, etc.)	State Only	Compliance Status (in or out)
None		N/A

State of Wisconsin
Department of Natural Resources

CURRENT EMISSIONS REQUIREMENTS AND STATUS OF UNIT
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-130 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S12C	4. Unit identification number: C32C (P32C)

5. Pollutant	6. Wis. Adm. Code Wis. Stats., 40 CFR	7. State Only	8. Limitation	9. Compliance Status (in or out)
Particulate Matter	NR 415.06(3)(a) Wis. Adm Code		0.4 pounds particulate per 100 pounds stack gas	In
Carbon Monoxide	NR 426.03 Wis. Adm. Code		General Limitations	In
Nitrogen Oxides	NR 428.03 Wis. Adm. Code		General Limitations	In
Sulfur Dioxide	NR 417.025 Wis. Adm. Code		General Limitations	In
Volatile Organic Compounds	NR 419.03 Wis. Adm. Code		3.5 pounds VOC per gallon coating, less water	In
Visible Emissions	NR 431.03 Wis. Adm. Code		20 Percent Opacity	In
Hazardous Air Pollutants	NR 445.03 Wis. Adm. Code	Yes	General Limitations	In

10. Other requirements (e.g., malfunction reporting, special operating conditions from an existing permit, etc.)	State Only	Compliance Status (in or out)
None		N/A

State of Wisconsin
Department of Natural Resources

CURRENT EMISSIONS REQUIREMENTS AND STATUS OF UNIT
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-130 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number S98 / S97	4. Unit identification number C10 (P11, P12, P13, P14, P15, P16, P41, P42, P72, P73, P74, P80A, P80C, P95) / C70 (P75)

5. Pollutant	6. Wis. Adm. Code Wis. Stats., 40 CFR	7. State Only	8. Limitation	9. Compliance Status (in or out)
Particulate Matter	NR 415.06(3)(a) Wis. Adm Code		General Limitations	In
Carbon Monoxide	NR 426.03 Wis. Adm. Code		General Limitations	In
Nitrogen Oxides	NR 428.03 Wis. Adm. Code		General Limitations	In
Sulfur Dioxide	NR 417.025 Wis. Adm. Code		General Limitations	In
Visible Emissions	NR 431.03 Wis. Adm. Code		20 Percent Opacity	In
Hazardous Air Pollutants	NR 445.03 Wis. Adm. Code	Yes	General Limitations	In
Volatile Organic Compounds	NR 419.03 Wis. Adm. Code		General Limitations	In

10. Other requirements (e.g., malfunction reporting, special operating conditions from an existing permit, etc.)	State Only	Compliance Status (in or out)
None		N/A

State of Wisconsin
Department of Natural Resources

CURRENT EMISSIONS REQUIREMENTS AND STATUS OF UNIT
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-130 11-93 Information attached? N (y/n))

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: S44, S45, S91	4. Unit identification number: P44, P45, P71

5. Pollutant	6. Wis. Adm. Code Wis. Stats., 40 CFR	7. State Only	8. Limitation	9. Compliance Status (in or out)
Volatile Organic Compounds	NR 419.03 Wis. Adm. Code		85% Control or LACT	In
Visible Emissions	NR 431.03 Wis. Adm. Code		20 Percent Opacity	In
Hazardous Air Pollutants	NR 445.03 Wis. Adm. Code	Yes	General Limitations	In

10. Other requirements (e.g., malfunction reporting, special operating conditions from an existing permit, etc.)	State Only	Compliance Status (in or out)
None		N/A

State of Wisconsin
Department of Natural Resources

EMISSION UNIT COMPLIANCE PLAN
COMMITMENTS AND SCHEDULE
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-131 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570
3. Stack identification number: All	4. Unit identification number: All

5. For Units that are presently in compliance with all applicable requirements, including any enhanced monitoring and compliance certification requirements under section 114(a)(3) of the Clean Air Act that apply, complete the following. These commitments are part of the application for Part 70 permits.

☒ We will continue to operate and maintain this Unit in compliance with all applicable requirements.

☒ Form 4530-130 includes new requirements that apply or will apply to this Unit during the term of the permit. We will meet such requirements on a timely basis.

6. For Units not presently fully in compliance, complete the following.

☐ This Unit is in compliance with all applicable requirements except for those indicated below. We will achieve compliance according to the following schedule:

Applicable Requirement	Corrective Actions	Deadline
1.		
2.		
3.		

Progress reports will be submitted:

Start date: _____ and every six (6) months thereafter

State of Wisconsin
Department of Natural Resources

CURRENT EMISSIONS REQUIREMENTS AND STATUS OF FACILITY
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-132 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger | 2. Facility identification number: 241063570

3. Pollutant	4. Wis. Adm. Code Wis. Stats., 40 CFR	5. State Only	6. Threshold Value	7. Compliance Status (in or out)
Carbon Monoxide	NR 426.03 Wis. Adm. Code		General Limitations	In
Nitrogen Oxides	NR 428.03 Wis. Adm. Code		General Limitations	In
Sulfur Dioxide	NR 417.025 Wis. Adm. Code		General Limitations	In
Volatile Organic Compounds	NR 419.03 Wis. Adm. Code		General Limitations	In
Visible Emissions	NR 431.03 Wis. Adm. Code		General Limitations	In
Hazardous Air Pollutants	NR 445.03 Wis. Adm. Code	Yes	General Limitations	In
Malodorous Emissions	NR 429.03 Wis. Adm. Code		General Limitations	In
Particulate Matter	NR 415.03 Wis. Adm. Code		General Limitations	In
All Pollutants	NR 445.05 Wis. Adm. Code	Yes	Diminimus	In

8. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in section 112(r)(7) of the Clean Air Act? ☐ Yes ☒ No

If you answered yes, please describe how you will achieve compliance with these provisions, including the requirement to formulate a plan for preventing accidental releases (sec. 112(r)(7)(B)(ii)):

9. Other requirements (e.g., malfunction reporting, special operating conditions from an existing permit, etc.)	State Only	Compliance Status (in or out)
None		

State of Wisconsin
Department of Natural Resources

FACILITY REQUIREMENT COMPLIANCE PLAN
COMMITMENTS AND SCHEDULE
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-133 11-93 Information attached? _ (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570

3. For facilities that are presently in compliance with all applicable requirements, including any enhanced monitoring and compliance certification requirements under section 114(a)(3) of the Clean Air Act that apply, complete the following. These commitments are part of the application for Part 70 permits.

☒ We will continue to operate and maintain this facility in compliance with all applicable requirements.

☒ Form 4530-132 includes new requirements that apply or will apply to this facility during the term of the permit. We will meet such requirements on a timely basis.

4. For facilities not presently fully in compliance, complete the following.

☐ This facility is in compliance with all applicable requirements except for those indicated below. We will achieve compliance according to the following schedule:

Applicable Requirement	Corrective Actions	Deadline
1.		
2.		
3.		

Progress reports will be submitted:

Start date: _____ and every six (6) months thereafter

State of Wisconsin
Department of Natural Resources

INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS
Form 4530-134 12-99

I.ADMINISTRATION	
This application contains the following forms:	☒ Form 4530-100, Facility Identification
	☒ Form 4530-101, Facility Plot Plan
	☒ Forms 4530-102, -102A, and -102B, Source and Site Descriptions

II. EMISSIONS SOURCE DESCRIPTION		Total Number of This Form
This application contains the following forms:	☒ Form 4530-103, Stack Identification	1
	☐ Form 4530-104, Boiler or Furnace Operation	
	☐ Form 4530-105, Storage Tanks	
	☐ Form 4530-106, Incineration	
	☐ Form 4530-107, Printing Operations	
	☒ Form 4530-108, Painting and Coating Operations	1
	☒ Form 4530-109, Miscellaneous Processes	13

III.AIR POLLUTION CONTROL SYSTEM		Total Number of This Form
This application contains the following forms:	☒ Form 4530-110, Miscellaneous	1
	☐ Form 4530-111, Condensers	
	☐ Form 4530-112, Adsorbers	
	☐ Form 4530-113, Catalytic or Thermal Oxidation	
	☐ Form 4530-114, Cyclones/Settling Chambers	
	☐ Form 4530-115, Electrostatic Precipitators	
	☒ Form 4530-116, Wet Collection Systems	2
	☐ Form 4530-117, Baghouses/Fabric Filters	

IV.COMPLIANCE DEMONSTRATION		Total Number of This Form
This application contains the following forms: (one for each facility boiler, printing operation, etc.):	☒ Form 4530-118, Compliance Certification - Monitoring and Reporting	5
	☐ Form 4530-119, Continuous Emission Monitoring	
	☐ Form 4530-120, Periodic Emission Monitoring Using Portable Monitors	
	☒ Form 4530-121, Control System Parameters or Operation Parameters of a Process	3
	☐ Form 4530-122, Monitoring Maintenance Procedures	
	☐ Form 4530-123, Stack Testing	
	☐ Form 4530-124, Fuel Sampling and Analysis	
	☒ Form 4530-125, Recordkeeping	5

V.EMISSION SUMMARY AND COMPLIANCE CERTIFICATION		Total Number of This Form
This application contains the following forms:	☒ Form 4530-126, Emission Unit Hazardous Air Pollutant Summary	1
	☒ Form 4530-127, Facility Hazardous Air Pollutant Summary	1
	☒ Form 4530-128, Emission Unit Summary	1
	☒ Form 4530-129, Facility Emissions Summary	1
	☒ Form 4530-130, Current Emissions Requirements and Status of Unit	4
	☒ Form 4530-131, Emission Unit Compliance Plan - Commitments and Schedule	1
	☒ Form 4530-132, Current Emissions Requirements and Status of Facility	1
	☒ Form 4530-133, Facility Requirement Compliance Plan Commitments and Schedule	1

VI.SIGNATURE OF RESPONSIBLE OFFICIAL

A. STATEMENT OF COMPLETENESS

I have reviewed this application in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this application are true, accurate and complete.

B. FOR RENEWALS ONLY

I have reviewed this application, the original operation permit application, and operation permit number(s)____ in their entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this renewal application are true, accurate and complete.

C. CERTIFICATION OF FACILITY COMPLIANCE STATUS (check one box only)
THIS IS NOT A REQUIREMENT OF NON-PART 70 SOURCES.

☒ I certify that the facility described in this air pollution permit application is fully in compliance with all applicable requirements.

☐ I certify that the facility described in this air pollution permit application is fully in compliance with all applicable requirements, except for the following emissions unit(s): (list all non-complying units)

Printed or Typed Name	Title
Scott Swosinski	Vice President and General Manager
Signature	Date Signed

SEND ALL MATERIALS TO:

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
BUREAU OF AIR MANAGEMENT
PERMITS SECTION
P.O. BOX 7921
MADISON, WI 53707-7921

State of Wisconsin
Department of Natural Resources

SUPPLEMENTAL INFORMATION
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-135 11-93 Information attached? N (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name: MASD / Kitzinger	2. Facility identification number: 241063570

3. This form supplements Form 4530 - All for Emission Unit (e.g. B01, P01, etc.) All

Additional Information	Item Number
Tables 1-16 – Emission Calculations	Tables 1-16
Table 17 – Stack Parameters	Table 17
Table 18 – Facility Paint Information	Table 18
IES 45,000 CFM Caustic Wash Scrubber and 4,000 CFM Acid Wash Scrubber Information from Manufacturer	Attachment A
Site Layout/Stack Locations	Attachment B

Additional Information (Diagrams)	Item Number
Malfunction Plan (included in December 2008 application)	-
MSDSs (included in December 2008 application)	-
Site Vicinity Map (included in December 2008 application)	-
Process Flow Diagram – Pennsylvania Avenue	Figure 1

State of Wisconsin
Department of Natural Resources

PERMIT REVISION OR RENEWAL REQUEST
FOR PROPOSED CONDITION CHANGES
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-136 Rev. 12/99 Information attached? Y (y/n)

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name and	Name	MASD / Kitzinger
mailing address	Street or Route	2529 E. Norwich Avenue
	City, State, Zip Code	Saint Francis, Wisconsin 53235
2. New Parent corporation	Name	Container Life Cycle Management (CLCM)
or Facility name	Street or Route	8570 South Chicago Road
(if name change being	City, State, Zip Code	Oak Creek, Wisconsin 53154
requested)	Country (if not U.S.)	

3. Type of Permit Revision: ☐ Administrative ☐ Minor ☒ Significant

4. Facility identification number: 241063570

5. Permit #(s) to be revised: 241063570-P12

6. Describe the proposed revision below (attach additional sheets if necessary). For a Renewal Request for Proposed Condition Changes, list the affected permit conditions here and attach additional sheets with the proposed changes identified.

See cover letter

7. SIGNATURE OF RESPONSIBLE OFFICIAL

A. STATEMENT OF COMPLETENESS

I have reviewed this application in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this application are true, accurate and complete.

B. CERTIFICATION OF FACILITY COMPLIANCE STATUS (check one box only)
THIS IS ONLY A REQUIREMENT FOR PART 70 SOURCES REQUESTING SIGNIFICANT REVISIONS OR RENEWAL CHANGES.

☐ I certify that the facility described in this air pollution permit application is fully in compliance with all applicable requirements.

☐ I certify that the facility described in this air pollution permit application is fully in compliance with all applicable requirements, except for the following emissions unit(s):

(list all non-complying units)

Printed or Typed Name Scott Swosinski	Title Vice President and General Manager
Signature	Date Signed

TABLES

TABLE 1. Total Emissions
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	TOTAL			
	PTE		MTE	
	lb/hr	ton/yr	lb/hr	ton/yr
Volatile Org. Cmpnds. (VOC)	42.59	77.73	42.59	186.56
Carbon Monoxide (CO)	1.27	5.57	1.27	5.57
Nitrogen Oxides (NO_X)	1.52	6.64	1.52	6.64
Particulates (PM)	0.69	1.70	28.77	126.00
Particulates-10 (PM-10)	0.12	0.50	0.12	0.50
Sulfur Dioxide (SO_2)	0.01	0.04	0.01	0.04
Lead (Pb)	0.00001	0.00003	0.00001	0.00003
Glycol Ethers (HAP)	2.45	5.10	2.45	10.74
Methylene Chloride (HAP)	25.76	9.66	25.76	112.81
Methanol (HAP)	3.64	1.36	3.64	15.93
Toluene (HAP)	1.82	0.68	1.82	7.96
Sodium Hydroxide (mist)	0.615	1.280	0.615	2.695
Hydrochloric Acid (mist)	0.378	0.786	0.378	1.656

TABLE 2. New Wet Caustic Scrubber Emissions - C10
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

PROCESS	EMISSION FACTOR emis./ lb used	SOLUTION STRENGTH %	USAGE PTE/MTE lb/hr	lb/mo	PTE gal/yr	lb/yr	MTE lb/yr	CONTROL EFF. %	TOTAL NaOH PTE/MTE lb/hr	PTE ton/yr	MTE ton/yr
All Units Venting to C10	1.0%	50.0%	123.08	42,667	40,000	512,000	1,078,154	0%	0.615	1.280	2.695

1. Potential Operating Hours: 4,160 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr

TABLE 3. Labeling Stripping Emissions - P44
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	MATERIAL CONTENT	USAGE				TOTAL		
		PTE/MTE	PTE		MTE	PTE/MTE	PTE	MTE
	lb/gal	gal/hr	gal/mo	gal/yr	gal/yr	lb/hr	ton/yr	ton/yr
VOC	1.52	3.00	188	2,250	26,280	4.56	1.71	19.97
Methylene Chloride	8.59	3.00	188	2,250	26,280	25.76	9.66	112.81
Methanol	1.21	3.00	188	2,250	26,280	3.64	1.36	15.93
Toluene	0.61	3.00	188	2,250	26,280	1.82	0.68	7.96

1. Potential Operating Hours: 4,160 hr/yr 12480
2. Maximum Operating Hours: 8,760 hr/yr

TABLE 4. Water Heater 4 Emissions - P12
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0020	17.52	0.168	0.736
NOx	100.0	0.0020	17.52	0.200	0.876
PM	7.6	0.0020	17.52	0.015	0.067
PM-10	7.6	0.0020	17.52	0.015	0.067
SO_2	0.6	0.0020	17.52	0.001	0.005
VOC	5.5	0.0020	17.52	0.011	0.048
Lead	0.0005	0.0020	17.52	0.000001	0.000004

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 2.0 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 5. Oil/Water Heater 3 Emissions - P13
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0020	17.52	0.168	0.736
NOx	100.0	0.0020	17.52	0.200	0.876
PM	7.6	0.0020	17.52	0.015	0.067
PM-10	7.6	0.0020	17.52	0.015	0.067
SO_2	0.6	0.0020	17.52	0.001	0.005
VOC	5.5	0.0020	17.52	0.011	0.048
Lead	0.0005	0.0020	17.52	0.000001	0.000004

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 2.0 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 6. Caustic Heater 2 Emissions - P14
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0036	31.54	0.302	1.325
NOx	100.0	0.0036	31.54	0.360	1.577
PM	7.6	0.0036	31.54	0.027	0.120
PM-10	7.6	0.0036	31.54	0.027	0.120
SO_2	0.6	0.0036	31.54	0.002	0.009
VOC	5.5	0.0036	31.54	0.020	0.087
Lead	0.0005	0.0036	31.54	0.000002	0.000008

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 3.6 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 7. Caustic Heater 1 and 2,000-Gallon Tank Emissions - P15
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0020	17.52	0.168	0.736
NOx	100.0	0.0020	17.52	0.200	0.876
PM	7.6	0.0020	17.52	0.015	0.067
PM-10	7.6	0.0020	17.52	0.015	0.067
SO_2	0.6	0.0020	17.52	0.001	0.005
VOC	5.5	0.0020	17.52	0.011	0.048
Lead	0.0005	0.0020	17.52	0.000001	0.000004

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 2.0 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 8. Drying Oven/Flamer Emissions - P41
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0006	5.26	0.050	0.221
NOx	100.0	0.0006	5.26	0.060	0.263
PM	7.6	0.0006	5.26	0.005	0.020
PM-10	7.6	0.0006	5.26	0.005	0.020
SO_2	0.6	0.0006	5.26	0.000	0.002
VOC	5.5	0.0006	5.26	0.003	0.014
Lead	0.0005	0.0006	5.26	0.000000	0.000001

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 0.6 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 9. Hot Water Heater Emissions - P42C
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0018	15.33	0.147	0.644
NOx	100.0	0.0018	15.33	0.175	0.767
PM	7.6	0.0018	15.33	0.013	0.058
PM-10	7.6	0.0018	15.33	0.013	0.058
SO_2	0.6	0.0018	15.33	0.001	0.005
VOC	5.5	0.0018	15.33	0.010	0.042
Lead	0.0005	0.0018	15.33	0.000001	0.000004

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input: 1.75 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 10. Drum Wipe Cleaning Emissions - P45
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	MATERIAL CONTENT	USAGE				TOTAL		
		PTE/MTE	PTE		MTE	PTE/MTE	PTE	MTE
	lb/gal	gal/hr	gal/mo	gal/yr	gal/yr	lb/hr	ton/yr	ton/yr
VOC	0.42	3.75	650	7,800	32,850	1.58	1.64	6.90

1. Potential Operating Hours: 4,160 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr
3. P45 is included to allow for the use of other compliant solvents in addition to the currently used acetone. This permit application uses potential VOC emissions calculated based on the misc. industrial solvent cleaning content restriction of 0.42 lb VOC/gal. In recent years, acetone was the only used solvent.

TABLE 11. De-Labeling Emissions - P71
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	MATERIAL CONTENT	USAGE				TOTAL		
		PTE/MTE	PTE		MTE	PTE/MTE	PTE	MTE
	lb/gal	gal/hr	gal/mo	gal/yr	gal/yr	lb/hr	ton/yr	ton/yr
VOC	0.42	3.75	650	7,800	32,850	1.58	1.64	6.90

1. Potential Operating Hours: 4,160 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr
3. P71 will be similar to P45, where it is included to allow for the use of other compliant solvents in addition to the currently used acetone. This permit application uses potential VOC emissions calculated based on the misc. industrial solvent cleaning content restriction of 0.42 lb VOC/gal. On P45, in recent years, acetone was the only used solvent.

TABLE 12. Acidizer Emissions - P75
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR emis./ lb used	SOLUTION STRENGTH %	USAGE PTE/MTE lb/hr	lb/mo	PTE gal/yr	lb/yr	MTE lb/yr	CONTROL EFF. %	TOTAL HCl PTE/MTE lb/hr	PTE ton/yr	MTE ton/yr
HCl	1.0%	31.45%	120.19	41,667	76,923	500,000	1,052,885	0%	0.378	0.786	1.656

1. Potential Operating Hou 4,160 hr/yr
2. Maximum Operating Hoi 8,760 hr/yr
3. The control unit is C70.
4. The received hydrochloric acid is presented as and it says 20 degrees baume hydrochloric acid. The Baume relates density to temperature, so at 20 degrees, the density will be 145/145-20 = 1.16 gm/mL (i.e. 31.45% concentration).

TABLE 13. Shot Blaster Emissions - P76
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

	EMISSION FACTOR	USAGE				CONTROL EFF.	TOTAL			
		PTE/MTE	PTE		MTE		PTE		MTE	
	lb PM/drum	drums/hr	drums/mo	drums/yr	drums/yr	%	lb/hr	ton/yr	lb/hr	ton/yr
PM	0.222	300	104,000	1,248,000	2,628,000	100%				

1. Potential Operating Hours: 4,160 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr
3. The emission factor of 0.222 was based on P31's current permitted levels.
4. The control effficiency is assumed 100% due to venting indoors.

TABLE 14. Closed Drum Drying Oven Emissions - P50C
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	USAGE MTE mmft^3/yr	TOTAL PTE/MTE lb/hr	TOTAL MTE ton/yr
CO	84.0	0.0006	5.26	0.050	0.221
NOx	100.0	0.0006	5.26	0.060	0.263
PM	7.6	0.0006	5.26	0.005	0.020
PM-10	7.6	0.0006	5.26	0.005	0.020
SO_2	0.6	0.0006	5.26	0.000	0.002
VOC	5.5	0.0006	5.26	0.003	0.014
Lead	0.0005	0.0006	5.26	0.000000	0.000001

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input (P50C alone - P50A and P50B are heated by Boiler B20): 0.60 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.

TABLE 15. Overspray Filter/Painting Emissions - P32C
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	MATERIAL CONTENT	USAGE				TOTAL		
		PTE/MTE	PTE		MTE	PTE/MTE	PTE	MTE
	lb/gal	gal/hr	gal/mo	gal/yr	gal/yr	lb/hr	ton/yr	ton/yr
VOC	3.0	11.60	4,021	48,256	101,616	34.80	72.38	152.42
Glycol Ethers	0.21	11.60	4,021	48,256	101,616	2.45	5.10	10.74

POLLUTANT	MATERIAL CONTENT	USAGE			TRANS. EFFICIENCY	CONTROL EFFICIENCY	TOTAL PM			
		PTE/MTE	PTE	MTE			PTE		MTE	
	solids/gal	gal/hr	gal/yr	gal/yr	%	%	lb/hr	ton/yr	lb/hr	ton/yr
PM	4.94	11.60	48,256	101,616	50%	98%	0.57	1.19	28.65	125.50

1. Potential Operating Hours: 4,160 hr/yr
2. Maximum Operating Hours: 8,760 hr/yr
3. Includes painting process PP32C - Auto External Drum Spray Booth.
4. The control unit is C32C.
5. The highest value for solids content was used based on currently used paints.

TABLE 16. Curing Oven Emissions - P32B
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

POLLUTANT	EMISSION FACTOR lb/mmft^3	USAGE PTE/MTE mmft^3/hr	mmft^3/yr	TOTAL PTE/MTE lb/hr	ton/yr
CO	84.0	0.0026	22.78	0.218	0.957
NOx	100.0	0.0026	22.78	0.260	1.139
PM	7.6	0.0026	22.78	0.020	0.087
PM-10	7.6	0.0026	22.78	0.020	0.087
SO_2	0.6	0.0026	22.78	0.002	0.007
VOC	5.5	0.0026	22.78	0.014	0.063
Lead	0.0005	0.0026	22.78	0.000001	0.000006

1. Maximum/Potential Operating Hours: 8,760 hr/yr
2. Maximum Heat Input (all units combined): 2.6 mmBtu/hr
3. Emission factor reference: U.S. EPA AP-42, Compilation of Air Pollutant Emission Factors, 5th Ed., Table 1.4-1 thru 3.
4. Includes combustion emissions from P32B - Internal Drum/Lid Lining Cure Oven.

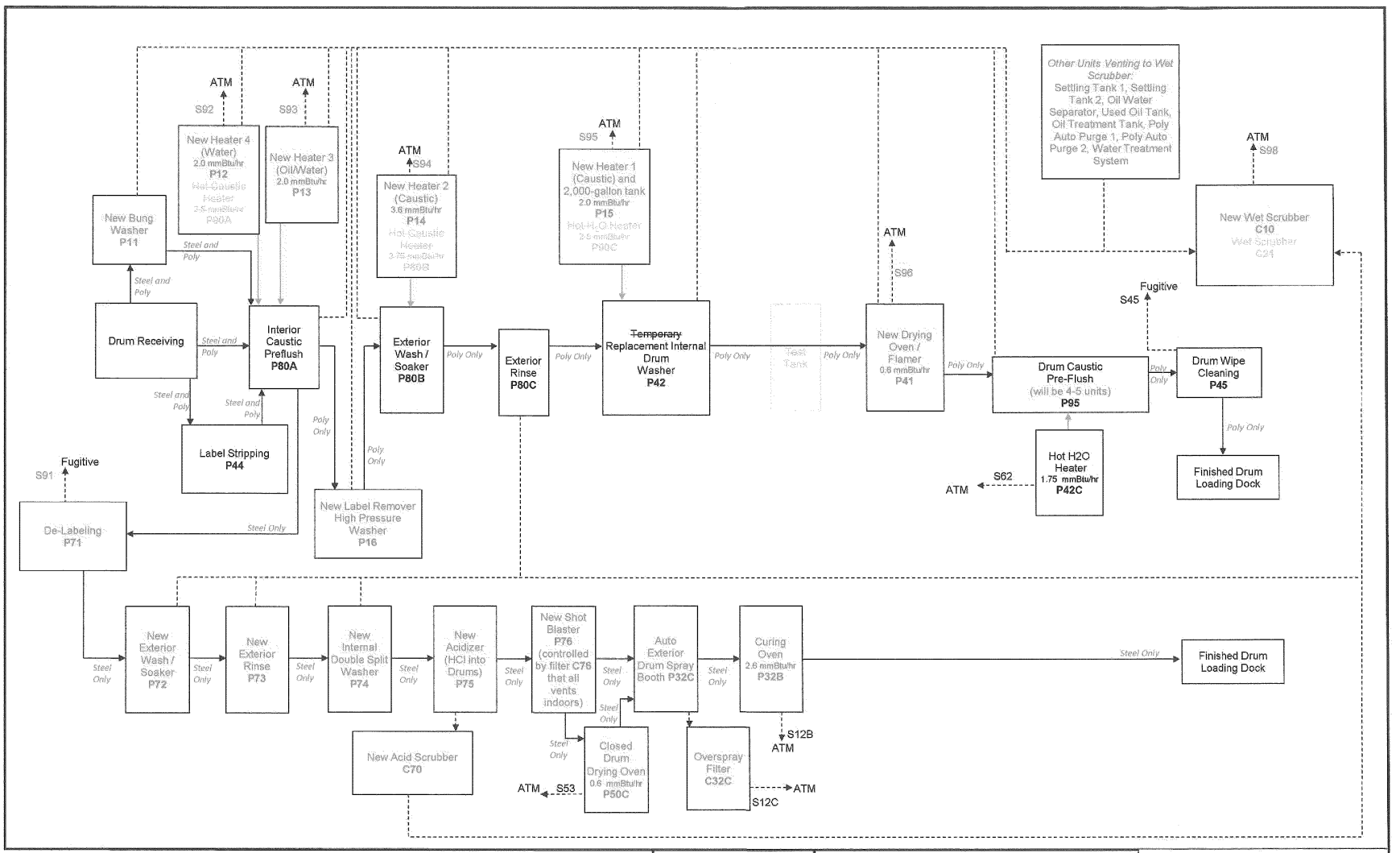
TABLE 17. Stack Parameters
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

Stack ID	Form	Exhaust/ Process-Control Unit	Process Name		Stack/ Fugitive	Discharge Height (ft)	Inside Dimensions/Stack Diameter		Exhaust/Stack Flow Rate		Exhaust Gas Temp. (Degrees F)	Exhaust/Stack Moisture Content		Exhaust Gas Discharge Direction	Obstr-uction (yes/no)
							Circular (ft)	Rectangular (ft x ft)	Normal (ACFM)	Maximum (ACFM)		Normal (% by Vol.)	Maximum (% by Vol.)		
S98	4530-116	C10	New Wet Scrubber	Steel and Poly	Stack	48	9.5		47,000	47,000	90	2	10	Up	No
S44 (fug)	4530-109	P44	Label Stripping	Steel and Poly	Fugitive	Fugitive					70				
S92	4530-109	P12	Water Heater 4	Steel and Poly	Stack	14	0.67		350	350	550	2	10	Up	No
S93	4530-109	P13	Oil/Water Heater 3	Steel and Poly	Stack	14	0.67		350	350	550	2	10	Up	No
S94	4530-109	P14	Caustic Heater 2	Poly	Stack	14	1.00		600	600	675	2	10	Up	No
S95	4530-109	P15	Caustic Heater 1 and 2,000-Gallon Tank	Poly	Stack	14	0.67		350	350	550	2	10	Up	No
S96	4530-109	P41	Replacement Drying Oven	Poly	Stack	28	1.00		Natural	Natural	190	2	10	Up	No
S62	4530-109	P42C	Drum Caustic Pre-Flush - Hot Water Heater	Poly	Stack	28	0.67		250	250	300	2	10	Up	Yes
S45 (fug)	4530-109	P45	Drum Wipe Cleaning	Poly	Fugitive	Fugitive					70				
S91 (fug)	4530-109	P71	De-Labeling (Steel Only)	Steel	Fugitive	Fugitive					70				
S53	4530-109	P50C	Closed Drum Drying Oven	Steel	Stack	35	1.00		2,700	2,700	170	2	10	Up	No
S12C	4530-110	C32C	Overspray Filters	Steel	Stack	35	2.17		Natural	Natural	150	2	10	Up	No
S12B	4530-109	P32B	Curing Oven	Steel	Stack	35	1.33		1,640	1,640	350	2	10	Up	Yes

TABLE 18. Facility Paint Information
MASD / Kitzinger, Pennsylvania Ave. - Updated July 2014

Name of Coating	Coating VOC Density (lb/gal)	Coating VOC Density less H_2O (lb/gal)
Gloss Black	1.28	3.00
Gray Enamel	1.29	2.90
Gray/White	1.26	2.60

FIGURE



Saga Env. and Eng., Inc. 110 E. Lake Street #1 Lake Mills, WI 53551 (920) 945-0601	Mid-America Steel Drum - Kitzinger St. Francis, WI **Figure 1: Facility Process Flow Diagram** **Pennsylvania Avenue Processes**	FILE: Process Flow Diagram DWN DATE: 07/28/14 PROJECT NO: 11-009 APPROVED: A. Litscher DRAFTER: A. Litscher

ATTACHMENT A

IES 45,000 CFM Caustic Wash Scrubber and 4,000 CFM Acid Wash Scrubber Information from Manufacturer

P75

IES

INTEGRATED ENVIRONMENTAL SERVICES, INC.
2689 118th Circle NE
Blaine, Minnesota 55449
Phone (763) 784-6726 Fax (763) 717-3033
gbuss@integratedenviro.com

June 18, 2014

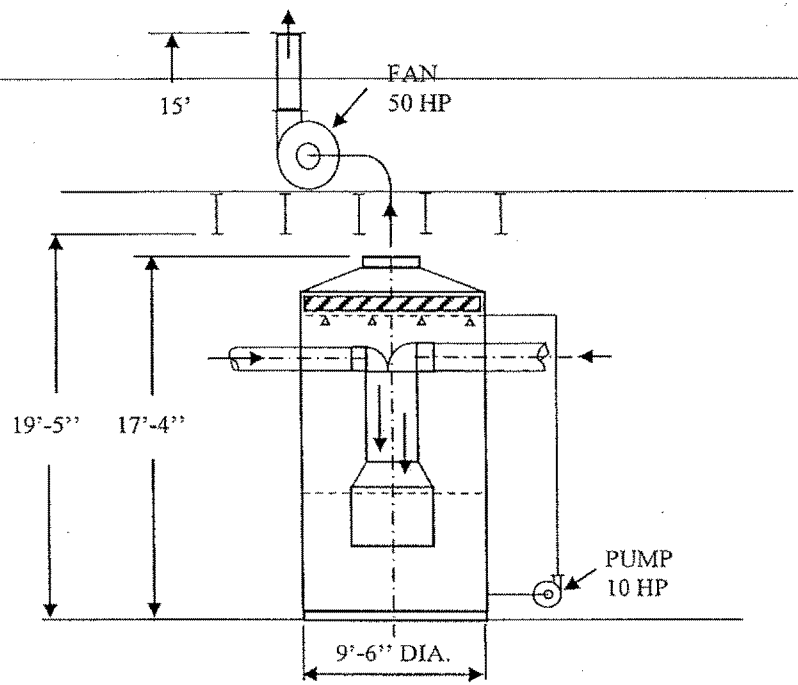
Mark Furgason
Kitzinger Cooperage Corporation
2529 E. Norwich Avenue
St. Francis, WI 53235

Mark,

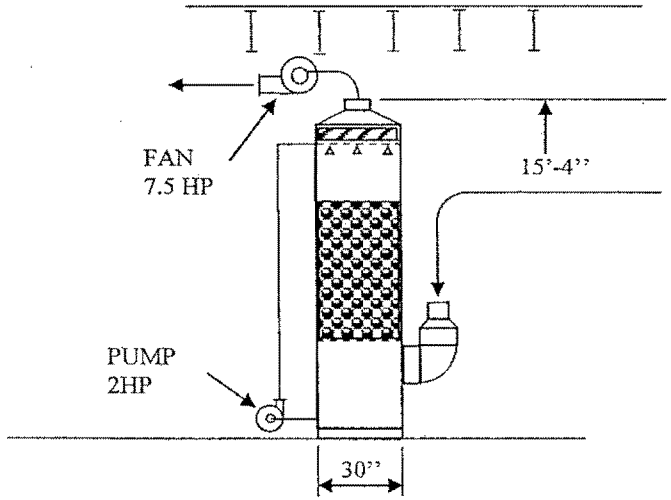
Integrated Environmental Services, Inc. is pleased to submit our proposal P-1322 for vapor control systems consisting of a 45,000 CFM scrubber to handle vapors from the new wash line and a 4,000 CFM acid wash scrubber. Pick up points 1-35 see reference drawings 1322-1 and 2. Systems will be supplied as listed.

ITEMS BY ***IES***

- 45K packed tower scrubber, 9'-6" diameter x 17'-4" H, 304 s.s.
- 45K fan, 50 hp, 304 s.s.
- Recycle pump, 316 s.s., 10 hp
- Recycle flow meter, Signet transmitter in FRP box
- Make up water flow meter
- ΔP pressure gauges
- Welded duct work all 304 s.s.
- Stack 48" dia. x 10', 304 s.s.
- Duct support
- Slide gate on each pick up
- 4K packed tower scrubber, 304 s.s.
- 4K fan, 7 1/2 hp, 304 s.s.
- Recycle pump, 2 hp, 316 s.s.
- PVC ductwork
- pH control Signet probe, Pulsatron pump
- Installation
- Supervision and start up

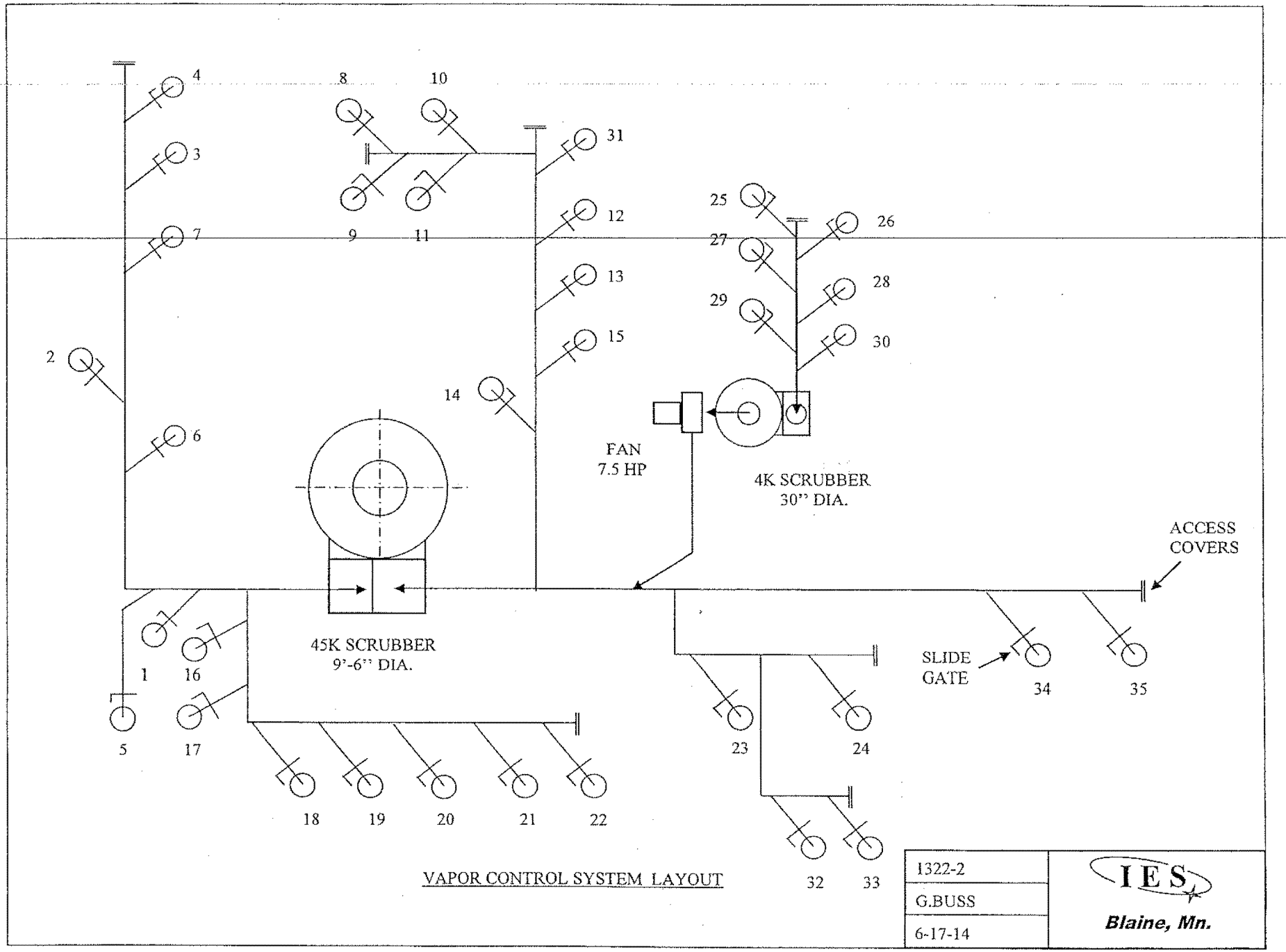


45K TOWER SCRUBBER



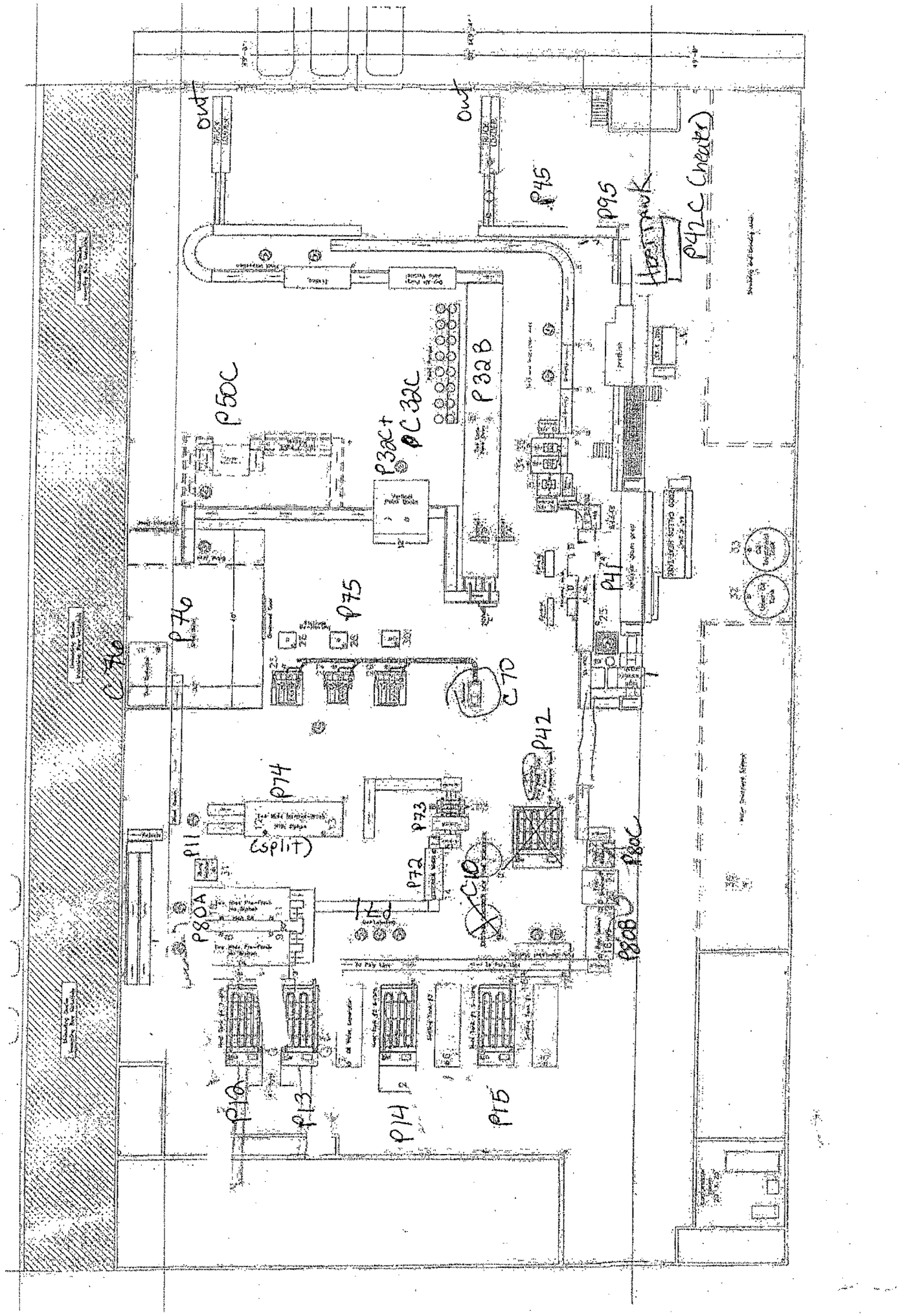
4K TOWER SCRUBBER

1322-1	IES
G.BUSS	Blaine, Mn.
6-17-14	



ATTACHMENT B

Stack Layout/Stack Locations


out
out
P45
P95
Heat Pump
P42C (heater)
P50C
P32C
P32B
P47
P75
P76
C70
P42
P74
(split)
P73
P72
C10
P80C
P80A
P80B
P10
P13
P14
P15